

# Employee Code of Conduct and Ethics

# Table of Contents

- I. Introduction** ..... 4
- II. Policies and Practices** ..... 5
  - A. Conflicts of Interest ..... 5
    - 1. Gifts & Entertainment ..... 5
    - 2. Loans or Personal Guarantees ..... 7
    - 3. Interests in other Businesses ..... 7
    - 4. Outside Employment & Activities ..... 7
  - B. Corporate Opportunities ..... 8
  - C. Protection and Proper Use of Company Assets ..... 8
  - D. Confidentiality ..... 10
  - E. Fair Dealing ..... 10
  - F. Employment Policies ..... 11
  - G. Compliance with Laws and Company Policies ..... 11
- III. Waivers of the Code** ..... 14
- IV. Compliance with the Code** ..... 14
- V. Reporting Suspected Non-Compliance** ..... 15
  - A. General Policy ..... 15
  - B. Complaint Procedure ..... 15
  - C. Protection Against Retaliation ..... 15
- VI. Resources** ..... 16

# A Message from Jeff Sloan, Chief Executive Officer of Global Payments Inc.

At Global Payments, we are committed to upholding the highest standard of ethical conduct. Every day we work to fulfill our mission of *Service. Driven. Commerce.* How? By delivering innovative solutions to help our clients drive commerce and better serve their customers. To do so, all employees must act ethically, with fairness and integrity. To put our mission and values into action, the Employee Code of Conduct and Ethics (the "Code") is intended to give all employees the tools to respond to situations that might violate our standards and company expectations.

Our commitment to excellence is fundamental to our corporate philosophy both at Global Payments Inc. and at our affiliated companies ("Global Payments"). This commitment to excellence means that employees and directors share a common set of objectives and benefit from the achievement of those objectives through ethical decisions and behavior.



Jeffrey S. Sloan  
*Chief Executive Officer*

# I. Introduction

The Code summarizes Global Payments' employment practices and procedures. It is not an exhaustive list of every workplace rule and policy, but rather a guide for employees.

## **This Code is not an employment contract**

This Code does not establish a contract or promise of continued employment (express or implied) with Global Payments. Global Payments reserves the right to modify, revise or revoke any provision of this Code, at any time, in its sole discretion, and without prior notification.

## **There are certain restrictions on third-party disclosures**

Employees are not permitted to reveal to any third party—including any governmental, law enforcement or regulatory authority—any information that the employee came to learn during the course of the employee's employment with Global Payments that is protected from disclosure by any applicable privilege. This includes but is not limited to the attorney-client privilege, attorney work product doctrine, and/or other applicable privileges. Finally, Global Payments does not waive any applicable privileges or the right to continue to protect its privileged attorney-client information, attorney work product, and other privileged information.

**This Code does NOT prohibit or limit** any employee or their counsel from initiating communications directly with, responding to any inquiry from, volunteering information to, or providing testimony before the Securities and Exchange Commission, the Department of Justice, or any other governmental, law enforcement or regulatory authority, in connection with any reporting of, investigation into, or proceeding regarding suspected violations of law. No employee is required to advise or seek permission from Global Payments before engaging in any such activity.

Please note that pursuant to the Defend Trade Secrets Act of 2016, you will not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that: (A) is made (i) in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney, (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal.

**This version of the Code of Conduct and Ethics supersedes and replaces** any prior communications, policies, rules, practices, standards, and/or guidelines that are less restrictive or contradictory, whether written or oral. To the extent there are any conflicts with a local Employee Handbook, the language of this Code supersedes the Employee Handbook.

## II. Policies and Practices

### A. Conflicts of Interest

All employees are expected to diligently avoid conflicts of interest.

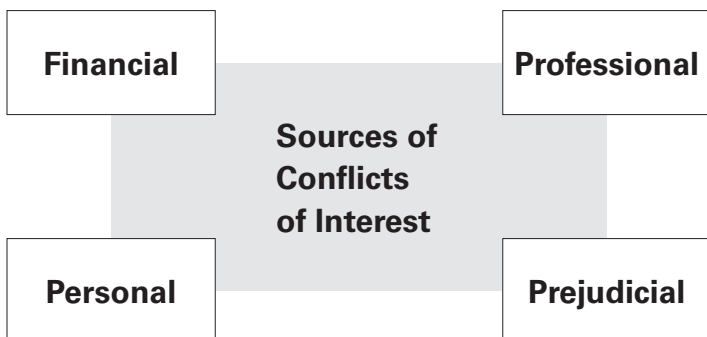
#### What is a conflict of interest?

A conflict of interest occurs when an employee's private interest (or the interest of a member of his or her family) interferes or conflicts, or even appears to interfere or conflict, with the interests of Global Payments. A conflict of interest can arise when an employee (or a member of his or her family) takes actions or has interests that may make it difficult to perform his or her work for Global Payments objectively and effectively.

Family members include a person's spouse, partner, parent, grandparent, sibling, child, grandchild, niece, nephew, aunt, uncle or cousin, whether through blood or marriage; including those of the person's spouse and/or partner; and any other individual that shares the same household with the person.

#### When might there be a conflict of interest?

The Code cannot cover all possible areas in which conflicts of interests might arise, but here are four of the more sensitive areas to avoid. If you encounter a situation that doesn't fit into one of these areas, use your instincts, and ask questions.



#### Think you have a conflict?

**Employees:** Discuss the matter with, and seek a determination and prior authorization or approval from your supervisor, the compliance officer, or the General Counsel. A supervisor or compliance officer may not authorize or approve conflict of interest matters without first providing the General Counsel with a written description of the activity and seeking the General Counsel's written approval.

**Executive officers:** Must seek determination and prior authorization or approval of potential conflicts of interest exclusively from the Audit Committee.

### 1. Gifts & Entertainment

#### Accepting or giving gifts

Our policy prohibits employees and members of their families from accepting or offering gifts or gratuities if they could create or be perceived as a conflict of interest. Receiving ordinary and occasional gifts, including without limitation business meals or events, holiday gifts (such as a bottle of wine or a food basket) or routine event tickets, may be permissible if they would not influence your relationship with a vendor or cause someone to reasonably question whether it would influence the relationship. However, any gifts are subject to the Company's Anti-Corruption Policy.

Some examples of gifts that might create a conflict of interest if offered to influence behavior are:

- Cash, gift certificates or other cash equivalents
- Meals or alcohol not provided in accordance with Company policies (i.e. lavish expense, at an inappropriate location for business discussions, not disclosed pursuant to Company policies when disclosure is required)
- Free or deeply discounted use of a vacation home or other travel perks
- Interest-free loans
- Tickets to sporting or theatre events
- Internship or job opportunity

## II. Policies and Practices (continued)

### **When giving a gift...**

Any gifts you give must be accurately and fully disclosed in the appropriate expense reports. You must include enough detail to reflect the true nature of the expense and the full names and business affiliation of those involved.

You also must disclose fully and accurately all gifts you receive from Global Payments' business partners if the frequency or value of the gift violates Company policy; i.e., a \$400 iPad or a \$50 bottle of wine sent monthly should be disclosed, but a \$30 box of chocolates given during the holidays need not be.

**Ask yourself: Would this person/business give me this gift if I weren't a Global Payments employee? Would I offer this gift if I weren't trying to secure a favor?**

### **Before accepting or giving a gift, consider...**

- Perception: How will others perceive the transaction?
- Reason: Why am I receiving or offering this gift? Would it improperly advantage the recipient or Global Payments?
- Effect: Does the transaction impact my professional obligations as a Global Payments' employee? Will it cloud my judgment or prevent me from being objective?
- Relationship: Is the person/business offering the gift one with whom Global Payments has (or might have) a business relationship?

**Ask yourself: If I made or accepted this payment directly, rather than through a third party, would I have acted consistently with this Code?**

### **Gifts to government officials**

Before entertaining or giving any item of value to a government official, employees must confirm requirements under applicable policies and procedures, including the Global Payments Anti-Corruption Policy, which may require obtaining pre-approval from a supervisor, a compliance officer or the General Counsel.

### **Improper use of funds**

The use of any funds or assets of Global Payments for any unlawful or improper gifts, payments to customers, government employees or third parties is strictly prohibited. You cannot do through third parties what you are prohibited from doing directly.

### **Q&A**

**Question:** A vendor offers you an all-expense paid trip to a championship sports event. To avoid offending the vendor, you initially accepted the gift. What should you do now?

**Answer:** The value of this gift makes its acceptance improper. You should contact your manager or the Legal Department to understand how to handle returning the gift. The vendor should be made aware of Global Payments' rules and policies regarding the acceptance of gifts by employees.



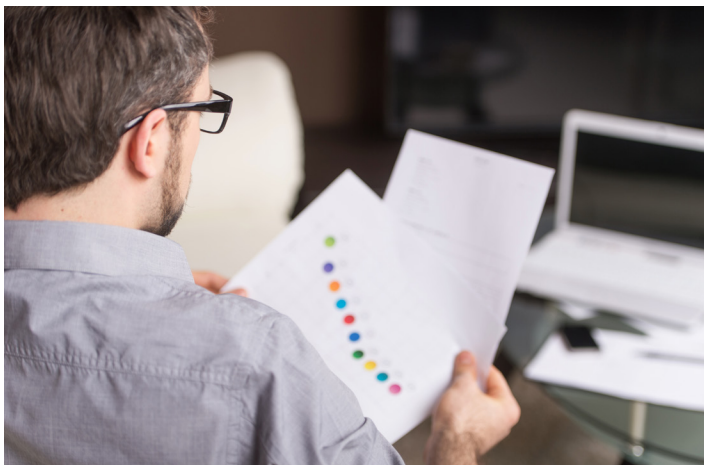
## II. Policies and Practices (continued)

### 2. Loans or Personal Guarantees

Loans or guarantees by Global Payments of obligations of employees or their family members are of special concern; they could constitute improper personal benefits to the recipients of such loans or guarantees. As a result, they are expressly prohibited.

### 3. Interests in Other Businesses

Without the prior written approval of the General Counsel, an employee must not make or maintain an investment in a competitor, customer or supplier of Global Payments. It is not a conflict of interest (and therefore approval is not required) to make or maintain investments in competitors, customers or suppliers that are listed on a national or international securities exchange or otherwise publicly traded—so long as the total value of the investment is less than one percent (1%) of the outstanding securities of the entity and your decision to invest is not influenced in any way by private information you learned as a result of your work at Global Payments; i.e., “inside” information that is not available to the public.



### 4. Outside Employment & Activities

An employee must disclose to the General Counsel or to the Chief Executive Officer if such employee (or a member of his or her family) has any relationship with a customer, competitor or a supplier of Global Payments; i.e., ownership interest, employment or consulting relationship, lender, etc. Without the written approval of the General Counsel, an employee shall not consult for, or be employed by or serve as a director or representative in any capacity of a customer, competitor or supplier of Global Payments or engage in any activity that is intended to or that could reasonably be expected to advance a customer's, competitor's or a supplier's interests at the expense of Global Payments' interests. Similarly, without the prior written approval of the General Counsel, an employee may not accept money or benefits of any kind from a third party as compensation or payment for any advice or services that he or she may provide to a customer, supplier or anyone else in connection with its business with Global Payments.

#### Q&A

**Question:** Your sibling is the partial owner of a vendor that provides supplies and services to your office. Are you required to disclose this relationship to Global Payments?

**Answer:** Yes. Even if the facts of the relationship between the vendor and Global Payments may not result in an actual conflict of interest, you must seek to avoid even the appearance of impropriety. You must discuss this relationship with your supervisor, the compliance officer or the General Counsel.



## II. Policies and Practices (continued)

### B. Corporate Opportunities

All employees are expected to advance Global Payments' interests when the opportunity arises. This means that an employee may not deprive the Company of a corporate opportunity.

The following behavior is prohibited without the prior written approval of the Chief Executive Officer:

- Employees may not use the Company's assets, property or information for their own personal gain, or for the gain of their friends or family members;
- Employees may not take for themselves personally (or for the benefit of friends or family members) or participate in opportunities that are discovered through the use of Company assets, property, information or their position with the Company;
- Employees may not bring a business opportunity to a Global Payments competitor, customer or supplier.

### C. Protection and Proper Use of Company Assets

All employees must protect Global Payments' assets and ensure their efficient use. The following behaviors have a negative impact on our profitability and reputation and thus are prohibited:

- Theft, carelessness and waste
- Embezzlement or misappropriation of money, funds or other items of value
- Failure to protect Global Payments' trade secrets or confidential information

Any employee found to be engaging in, or attempting, theft of any property of Global Payments, including documents, equipment, intellectual property, personal property of other employees, cash or any other items of value may be subject to immediate termination and possible criminal proceedings. All Company assets should be used only for legitimate business purposes, except as otherwise provided in this Code. Any suspected incident of fraud or theft should be reported for investigation immediately.

### Use of telephone lines, fax machines, computers & other business equipment

Global Payments' business operations rely heavily on communications. It is central to everything we do. Global Payments has invested in telephone lines, electronic mail systems, mobile devices and other business equipment to keep our operations flowing smoothly and effectively.

Employees should be aware that use of electronic mail, Internet searching apparatus, telephone equipment and other Company equipment may be monitored by Global Payments with or without prior notice for the purpose of protecting Company equipment and information, as well as ensuring equipment and information are used appropriately. Accordingly, employees are discouraged from using Global Payments' devices and resources for personal activities because those activities are subject to review without notice.

Misuse of Global Payments' equipment or information may subject an employee to discipline up to and including termination. Employees should refer to the policies in their local Employee Handbook for further information regarding use of such equipment.

**Strictly Prohibited: Do not use any Global Payments equipment or resources to view or transmit derogatory, harassing or pornographic information.**





## II. Policies and Practices (continued)

### Intellectual property

All employees share the obligation to protect Global Payments' assets, including the Company's proprietary information. Unauthorized use or distribution of this information is prohibited and could be illegal, resulting in civil or criminal penalties.

#### Global Payments' intellectual property includes, but is not limited to:

- Trade secrets
- Patents
- Trademarks
- Copyrights
- Business and marketing plans
- Computer code designs
- Databases
- Records
- Any non-public financial data or reports

### Always get approval

Any agreement respecting the disclosure or ownership of Global Payments' intellectual property must be approved by a member of the Legal Department.

- Global Payments respects the intellectual property of others. In your work for, or on behalf of, Global Payments, do not use trade secret or proprietary information belonging to a third party unless (1) Global Payments has an agreement to use that intellectual property, or (2) you have discussed the proposed use with a member of the Legal Department.
- Any proposed name of a new product, financial instrument or service intended to be sold or rendered to customers requires approval for clearance by the General Counsel prior to its adoption or use.

### Copyrighted materials

It is Global Payments' policy to respect copyright laws and comply with the terms and conditions of our license agreements, which may limit copying and use of software. Employees must avoid the unauthorized use of copyrighted materials. Please confer with the General Counsel if you have any questions regarding the permissibility of photocopying, excerpting, electronically copying or otherwise using copyrighted materials.

Remember, simply because material is available for copying—such as matter downloaded from the Internet—does not mean that it is permissible to recirculate. Keep in mind the following about copyrighted materials:

- Among the copyrighted materials that employees may use in the course of their employment are software programs that Global Payments has acquired for word processing, financial calculations and other applications. These products are covered by a license agreement that provides the terms and conditions on which this software may be used by Global Payments' employees.
- All copies of work that is authorized to be made available for ultimate distribution to the public, including all machine readable works such as computer software, must bear the prescribed form of a copyright notice.
- All files, records and reports acquired or created in the course of employment are the property of Global Payments.



## II. Policies and Practices (continued)

### D. Confidentiality

Employees must maintain the confidentiality of information entrusted to them by Global Payments or its customers or suppliers, except when disclosure is authorized or legally required. Confidential information must not be used in any way other than as required in performing employment duties.

#### **Confidential information includes, but is not limited to:**

- Pricing
- Financial data
- Computer code and data
- Business plans
- Corporate opportunities
- Products and services in development
- Intellectual property
- Information pertaining to any prospective acquisition
- Information pertaining to any prospective divestiture

Sometimes, it can be hard to tell if information is confidential. Ask yourself the following questions, and if you answer yes to more than one, the information is probably confidential:

1. Is the information non-public?
2. Might it be useful to competitors, customers or suppliers?
3. Might it be harmful to Global Payments if disclosed?
4. Does it include information acquired by Global Payments from its customers, suppliers or others with whom it transacts business, or information relating to transactions handled by Global Payments or parties to those transactions?

***Please ask your supervisor or manager if you cannot determine whether information is confidential.***

#### **Information belonging to Global Payments**

All files, records and reports acquired or created in the course of employment are the property of Global Payments. Originals or copies of such documents may be removed from the Company's offices for the sole purpose of performing the employee's duties for Global Payments and must be returned when such purpose has been served or upon request.

Additionally, all records should be retained in accordance with the Company's Records Retention Policy for as long as a business need exists for the record or a legal requirement is in place to preserve the record. You must comply with all requirements regarding the preservation of specific records.

***Any questions regarding the safeguarding or disclosure of any confidential information should be directed to the General Counsel.***

### E. Fair Dealing

You must deal fairly with our customers, suppliers, partners, service providers, competitors, employees and anyone else with whom you have contact in the course of performing your job.

No employee may take unfair advantage of anyone through manipulation, concealment, abuse of confidential and privileged information, misrepresentation of material facts, or any other unfair dealing practice.



## II. Policies and Practices (continued)

### F. Employment Policies

We are committed to equal employment opportunity.

Global Payments fosters a work environment in which all individuals are treated with respect and dignity. Each individual deserves a business-like work atmosphere that prohibits discriminatory practices or harassment. Therefore, Global Payments expects that all relationships among persons in the workplace be respectful and free of unlawful bias, prejudice, or harassment.

#### **Discrimination & harassment**

We do not discriminate on the basis of race, color, national origin, religion, sex (including pregnancy), ancestry, age, marital status, disability (physical or mental), sexual orientation, gender identity, gender expression, medical condition, military status, veteran status, genetic information or any other status protected by law.

Harassment has no place in the Global Payments community. Global Payments prohibits all forms of harassment, unprofessionalism and discourteous actions, including but not limited to derogatory racial, ethnic, religious, age, sexual orientation, sexual or other inappropriate remarks, slurs or jokes in our workplaces or at any Company events.

#### **Believe you experienced or witnessed discrimination or harassment? Speak up.**

Any employee who believes that he/she is or may be subjected to objectionable conduct or harassment (or who witnesses someone else subjected to such conduct) should report it immediately in accordance with the procedures set forth in their Employee Handbook or this Code. No employee in this organization is exempt from this policy. In response to every complaint, Global Payments will take prompt investigatory, corrective and preventative actions as necessary and/or appropriate. Any employee who engages in objectionable conduct or harassment is subject to discipline up to and including termination.

### G. Compliance With Laws and Company Policies

No employee of Global Payments has the authority to violate any law or to direct another employee or any other person to violate any law on behalf of Global Payments.

Here are some common laws, rules and regulations that apply to us, but if you have any questions about these or other applicable laws, just ask.

#### **Securities laws**

Employees must not buy, sell, recommend or trade Company securities—either personally or on behalf of someone else—while in possession of material, non-public information relating to Global Payments, unless pre-approved by the General Counsel.

Employees must not communicate or disclose such information to others who may trade in Global Payments' securities. Doing so may not only be a violation of an employee's duty to keep such information confidential, but also may be a violation of U.S. federal and state laws, and the laws of many countries in which we operate.

We expect all employees, their families and others whose relationships with Global Payments give them access to insider information to comply with these principles and Global Payments' Insider Trading Policy, which is available on our intranet site or from your regional compliance officer.

#### **Privacy & data protection**

Employees are entrusted with the responsibility to properly handle sensitive information about Global Payments, our customers and a host of other organizations and individuals.

When you collect, use, share, retain and dispose of private or personal information, you must be sure to comply with the law, Global Payments' internal Privacy Policy, and our high standards of fairness, good corporate citizenship and respect for privacy and confidentiality. In addition, as a global company, care must be taken to comply with the laws of each jurisdiction in which we operate and to understand when personal data may be transferred from an office or other location in one country to a location in another.

#### **What are some examples of personal information?**

Examples of personal information include, but are not limited to, name, address, date of birth, personal email address, and social security number or national identification number. For more information, refer to the Internal Privacy Policy available on our intranet site or from your regional compliance officer.

## II. Policies and Practices (continued)

### Anti-money laundering laws

Money laundering is making money derived from unlawful activities “clean” by making it appear that the money comes from legitimate sources or transactions.

### What’s my responsibility?

We all have a role to play in helping to prevent criminals and targets of sanctions from using Global Payments’ products and services. This includes an obligation to identify and report suspicious activity. Employees can learn how to do their part through mandatory anti-money laundering compliance training conducted by Global Payments. For more information, refer to the Anti-Money Laundering Compliance Program available on our intranet site or from your regional compliance officer, as well as the applicable regional Anti-Money Laundering Policies available from the regional Compliance Officers or the Legal Department.

### Antitrust and fair competition

Antitrust laws, sometimes also called competition laws, govern the way that companies behave with respect to their competitors, customers, and suppliers. Antitrust laws encourage healthy and fair competition among businesses.

Violating antitrust laws is a serious matter and could place both the Company and the responsible individual(s) at risk of substantial criminal penalties. In all regions and countries where we do business, Global Payments is committed to competing vigorously, but fairly, for suppliers and customers.

### What’s my responsibility?

To adhere to antitrust laws, employees must not:

- Communicate with any competitor relating to price or any term that affects pricing;
- Divide or allocate markets or customers;
- Agree with a competitor to boycott another business;
- Put inappropriate conditions on purchases or sales; or
- Misrepresent Global Payments’ or our competitors’ products or services.

### Human rights

Global Payments is committed to conducting business in an ethical manner and will not tolerate any slavery, human trafficking or forced labor within the business. You must report if you observe any such activities within Global Payments and ensure that Global Payments does not work with suppliers or other partners who promote or tolerate such activities. You also must comply with local laws which prohibit slavery and human trafficking.

### Sanctions & embargoes

The United States government uses economic sanctions and trade embargoes to further various foreign policy and national security objectives. You must abide by all economic sanctions or trade embargoes that the United States has adopted, regardless of whether they apply to foreign countries, political organizations or particular foreign individuals and entities. If you have a question about whether a transaction on behalf of Global Payments complies with applicable sanction and trade embargo programs, ask the General Counsel.

### Q&A

**Question:** You are at a conference attended by Global Payments’ competitors. During a social event, employees of these competitors begin to discuss pricing. Can you join the discussion?

**Answer:** No. You must avoid any such discussions regarding pricing or other commercial terms with Global Payments’ competitors. You should explain that you cannot participate in the conversation and report the details of this to the Legal Department.



## II. Policies and Practices (continued)

### International operations

Global Payments is a global business. As a result, our operations—and, of course, our employees—are subject to the laws of many other countries and jurisdictions. You are expected to comply with the Code and all applicable government laws, rules and regulations. If a provision of this Code conflicts with the law of another country, then the law of the country in which you are based or otherwise doing business for the Company controls. Because Global Payments Inc. is incorporated and headquartered in the United States, you are subject to U.S. law regardless of where you are based. Other countries also may apply their laws outside their borders to Company operations and personnel. If you are uncertain what laws apply to you, or if you believe there may be a conflict between different applicable laws, consult the Legal Department before proceeding. Additional guidance regarding compliance with local laws can be found in Global Payments' Anti-Corruption Policy, available on our intranet site or through the Legal Department.

### Political contributions and activities

In accordance with Global Payments' Anti-Corruption Policy, Company contributions, whether monetary or in-kind, are prohibited unless approved in advance by the Company's Chief Executive Officer. Employees may participate personally in the political process, but must do so in accordance with all applicable campaign finance and anti-corruption laws.

### Transactions with governments

In doing business with government officials, Global Payments is committed to acting honestly and complying with all applicable laws and regulations to avoid even the appearance of impropriety. When the Company sells services to any government, we must know and comply with such requirements and with all applicable Company policies.



### Disclosure

Global Payments is required to file a range of documents with the Securities and Exchange Commission ("SEC"). The SEC is part of the United States government, and it enforces securities laws and regulates industries that trade on any U.S. stock exchange. All documents Global Payments files with the SEC—including periodic reports, financial statements and other financial information—must comply with applicable federal securities laws and SEC rules. All Company funds, assets and disbursements must be properly and accurately recorded in the appropriate records and books of account. The making of false or misleading entries, records or documentation is strictly prohibited.

### Employees' duties

Each employee who contributes in any way in the preparation or verification of Global Payments' financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. You must cooperate fully with Global Payments' accounting and internal audit departments, as well as the Company's independent public accountants and counsel. In particular, each employee who is involved in the Company's disclosure process must:

- Be familiar with and comply with Global Payments' disclosure controls and procedure and its internal control over financial reporting; and
- Take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of Global Payments provide full, fair, accurate, timely and understandable disclosure.

Employees who are involved in Global Payments' disclosure process should refer to the Disclosure Committee Charter available from the Legal Department for additional requirements. These employees must be aware of and strictly follow additional guidelines addressed in Global Payments' Anti-Corruption Policy available on our intranet site or from your regional compliance officer.

### Q&A

**Question:** Your office has received a request for a political donation to a local elected official. Is the office allowed to make such a donation?

**Answer:** Only if approved in accordance with the Global Payments Anti-Corruption Policy. Company contributions, whether monetary or in-kind, to political parties, party officials and candidates are not permitted except in accordance with all applicable campaign and election laws and must be approved by the Company's Chief Executive Officer.

### III. Waivers of the Code

Any waiver of this Code for executive officers may be made only by the Audit Committee of the Board of Directors or any other committee designated by the Audit Committee, and will be disclosed as required by law or stock exchange regulation. Any waivers of this Code for other personnel (i.e., non-executives) may be made by the General Counsel or his or her designees. Waiver of a specific provision of this Code shall not operate as a waiver of other requirements of this Code.

### IV. Compliance with the Code

All employees have a responsibility to understand and follow this Code. Employees are expected to perform their work with honesty and integrity—including in all areas not addressed by this Code. Any violation of the applicable laws, regulations or principles set forth in this Code will be grounds for disciplinary action, which may include termination from employment, and may subject the individual to civil liability and/or criminal prosecution under applicable law. Any individual who authorizes or permits another to engage in a violation also will be subject to disciplinary action, which may include termination and/or other penalties.

**Global Payments strongly encourages dialogue among employees and supervisors to make everyone aware of situations that give rise to ethical questions and to articulate acceptable ways of handling those situations.**

All new employees must sign an acknowledgment form confirming that they have read the Code and agree to abide by its provisions. All employees may be required to make similar acknowledgments on a periodic basis. Failure to read the Code or sign the acknowledgment form does not excuse an employee from compliance with the Code.

This Code reflects general principles to guide employees in making ethical decisions and cannot, and is not intended to, address every specific situation. As such, nothing in this Code prohibits or restricts Global Payments from taking any disciplinary action on any matters pertaining to employee conduct, whether or not they are expressly discussed herein.



# V. Reporting Suspected Non-Compliance

## A. General Policy

An employee who is aware of or suspects the following has an affirmative duty to come forward to report the information:

- Misconduct
- Illegal activities
- Unethical behavior
- Fraud
- Abuse of Company assets
- Violations or potential violations of laws, rules, regulations, or of any provision of this Code
- Any concerns regarding accounting, internal accounting, controls or auditing matters

An employee who reports improper—or potentially improper—behavior must provide as much information as possible, including details of the suspected misconduct and the identity of the persons involved. Because failure to report criminal activity can itself be understood to condone the crime, we emphasize the importance of reporting. Failure to report knowledge of wrongdoing may result in disciplinary action against those who fail to report.

***You are expected to report any knowledge of prohibited behavior, even if the conduct relates to a third party or to a supervisor/manager. Do not assume that someone else is filing a report. You have an independent obligation to ensure compliance.***

## B. Complaint Procedure

Reports can be made by contacting any of the following:

General Counsel . . . . . 770.829.8256

Human Resources . . . . . 404.926.9736

To make an anonymous report, in the countries where allowed, or to report non-anonymously 24/7, our Internet-based reporting system called EthicsPoint® may be used. Go to the link on Global Payments' intranet website, or to [www.ethicspoint.com](http://www.ethicspoint.com). Anonymous reports can also be made by telephone.

EthicsPoint® toll-free hotline  
from U.S. or Canada . . . . . 1.866.384.4277

Toll-free numbers from other international locations are available on EthicsPoint®'s website.

Note: These reports remain anonymous, where allowed by law. If you have a question about whether a report can be made anonymously in the country in which you are based, you can raise this question anonymously through the hotline. Toll free numbers from other international locations are available on EthicsPoint®'s website.

### Investigation

Reports of violations will be investigated as appropriate by the Legal Department, human resources personnel or other appropriate management personnel or, if needed, the Audit Committee of the Board of Directors. Any reported violations related to accounting, internal accounting controls or auditing matters will be reported to the Chairman of the Audit Committee of the Board of Directors. All employees are expected to cooperate in the investigation of reported violations.

### Confidentiality

Global Payments will treat the reports in a confidential manner (consistent with appropriate evaluation and investigation). To the extent practical and appropriate under the circumstances, Global Payments will make reasonable efforts not to disclose the identity of anyone who reports a suspected violation. Reports submitted through EthicsPoint® will remain anonymous, unless the employee indicates otherwise or applicable law prevents anonymous reporting. Employees should be aware that the individuals conducting the investigation are obligated to act in the best interest of Global Payments, and do not act as personal representatives or lawyers for employees.

## C. Protection Against Retaliation

Retaliation in any form against an individual who, in good faith, files a report or who assists in the investigation of a reported violation is itself a serious violation of this Code and will not be tolerated by Global Payments. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Global Payments will protect any employee who raises a concern honestly, but keep in mind that it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.



## VI. Resources

The following are useful addresses and telephone numbers:

### **General Counsel**

David Green  
David.Green@globalpay.com  
770.829.8256  
3550 Lenox Road  
Atlanta, GA 30326

### **Compliance**

Worldwide: worldwide.compliance@globalpay.com  
Asia Pacific: APCompliance@globalpay.com  
Canada: Canadian.Compliance@globalpay.com  
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