



Business Gifts and Entertainment Policy

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Original Publication Date:	February 1 st , 2024
Current Publication Date:	October 17 th , 2025
Policy Review Due Date:	March 6 th , 2026
Information Classification:	Public
Version:	V2.0

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Summary of Key Policy Statements

Summary Reference	Summary Statement
BGE – P1	Purpose and Scope: The policy guides all Worldpay colleagues and representatives in giving, accepting, or receiving Business Gifts or Entertainment and Hospitality, aiming to prevent conflicts of interest, improper influence, and ensure compliance with anti-bribery laws.
BGE – P2	Disclosure and Approval: Gifts over \$100 USD, Entertainment or Hospitality over \$250 USD per person, or any Gifts/Entertainment to Government Officials (regardless of value) must be disclosed and approved through the Disclosure Application before being given or accepted.
BGE – P3	Prohibited Conduct: Colleagues must never solicit Gifts or Entertainment for personal benefit, exchange Gifts during contract negotiations, offer or accept cash or cash equivalents, or participate in strictly prohibited events (e.g., adult entertainment, gambling, illegal activities).
BGE – P4	Returning or Declining Gifts: Any Gift or Entertainment that violates the policy should be politely declined or returned. If returning is impractical, it may be accepted on behalf of Worldpay with prompt notification to the Ethics Office.
BGE – P5	Industry Events: Attendance at Industry Events where costs are paid by sponsors requires advance approval from senior leadership. If a guest is invited, the colleague must cover all guest expenses personally.

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Policy Purpose

The purpose of the Business Gifts and Entertainment Policy ("Policy") is to explain what is required by colleagues before giving, accepting, or receiving Business Gifts or Entertainment and Hospitality. The requirements in this Policy help colleagues to prevent actual, potential, or perceived conflicts of interest, resist improper influence, drive responsible use of Worldpay's assets, and support the Company's compliance with applicable laws relating to bribery and corruption, including but not limited to the Foreign Corrupt Practices Act and the UK Bribery Act.

The Policy provides guidance to colleagues in conducting business in accordance with Worldpay's ethical standards and understanding what constitutes acceptable behavior. This Policy also assists in protecting the Company's reputation and provides the Company visibility into the intent behind Business Gifts or Entertainment and Hospitality either given to, accepted, or received by colleagues.

Policy Scope

This Policy applies to all colleagues, prospective employees, independent contractors, consultants, directors, and others acting on behalf of any Worldpay legal entity or affiliate (the "Company").

Statement

The Policy is designed to assist colleagues in making the right decisions regarding giving, accepting, or receiving Business Gifts or Entertainment and Hospitality. This Policy does not apply to Gifts or Entertainment and Hospitality between colleagues, which are governed by the Employee Gifts, Prizes, and Awards Policy. This Policy also does not apply to events coordinated and planned through the Worldpay Corporate Global Events and Marketing team.

This Policy is not designed to answer every specific question or scenario but rather is designed to provide guidance around Business Gifts or Entertainment and Hospitality. Colleagues are encouraged to seek assistance from the Ethics Office at WorldpayEthicsOffice@worldpay.com with questions or scenarios not addressed in this Policy.

Violations of this Policy may result in disciplinary action up to and including termination of employment in accordance with local laws.

Alignment to Risk Appetite

In accordance with Worldpay's Risk Taxonomy, as approved by the Executive Risk Committee under delegated authority from the Board, and in alignment with the Company's Business Gifts and Entertainment Policy, Worldpay maintains a low appetite for Legal and Compliance Risk. This reflects

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the Company's strong commitment to compliance with applicable laws, regulations, and card brand requirements, and its unwillingness to knowingly deviate from these standards.

Worldpay's exposure to Legal and Compliance Risk in the context of Business Gifts and Entertainment is primarily driven by the potential for perceived or actual improper influence, conflicts of interest, or violations of anti-bribery and anti-corruption laws. Inappropriate or excessive gifts and entertainment may be construed as commercial bribery, thereby posing reputational and legal risks to the Company.

This document sets forth a program by which Worldpay manages Legal and Compliance Risk associated with Business Gifts and Entertainment. It emphasizes strict adherence to internal thresholds and requires pre-approval for any interaction involving Government Officials, regardless of value. The program supports Worldpay's risk appetite objectives by promoting transparency, ethical conduct, and proactive compliance oversight through the Ethics Office and the Disclosure Tool.

Glossary of Terms

Term	Definition
Bribery	Bribery is anything of value given to an individual or their Relative to influence actions or decisions to gain or retain a business advantage.
Business Gift	Business Gift is any item of monetary value given to or received from a current or potential client, customer, supplier, business partner or other third party, including trade and professional associations and others who interact with the Company on business matters.
Business Entertainment and Hospitality	Business Entertainment and Hospitality are experiences or activities including, but not limited to, business meals, tickets or access to sporting events, concerts or cultural events, or leisure activities such as a round of golf. Entertainment and Hospitality is also the offering of travel, hotel, or other accommodations, including the use of personal accommodations. Business Entertainment and Hospitality is intended to build goodwill and successful business relations without creating a feeling of obligation or compromising your judgment. These events should be occasional and not part of

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	<p>an actual or perceived pattern of frequently providing or accepting courtesies from the same entities or persons. If a Worldpay representative is not present at the activity or event, it is not Entertainment and Hospitality but, instead, is considered a Business Gift.</p>
Government Official	<p>Government Official means:</p> <ul style="list-style-type: none">• Any officer or employee of a state, local or federal government;• Any officer or employee of a department, agency, or instrumentality of a state, local or federal government (which includes a government-owned or government-controlled state enterprise);• Any officer or employee of a “public international organization,” which includes such organizations as the World Bank, the International Finance Corporation, the International Monetary Fund, and the Inter-American Development Bank;• Any person acting in an official capacity for or on behalf of a government or government-owned entity or public international organization;• Any political party or party official, any candidate for political office or consultants who hold government positions;• Colleagues of companies owned or controlled by governments, political party officials and others; or• Any Public Official.
Industry Event	<p>Industry Event refers to organized gatherings, conferences, trade shows, seminars, workshops, and other professional events that are directly related to the business sector in which the Company operates. These events are typically attended by industry professionals, stakeholders, and experts to discuss trends, share knowledge, and network. Participation in Industry Events is considered to serve a Legitimate Business Purpose when it serves</p>

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	<p>to enhance professional relationships, gain industry insights, and promote the Company's interests.</p>
Lavish	<p>Lavish indicates Business Gifts or Entertainment and Hospitality that could be viewed by others as excessive or out of the norm and includes events such as exclusive sporting events, high-end dining, luxury travel, spa and wellness retreats or the like, and exclusive parties or gatherings. Specific examples, include but are not limited to the Academy Awards, Grammy Awards, Brit Awards, Superbowl, Wimbledon and the Monte Carlo Grand Prix. If you are unsure as to whether a Business Gift, or Entertainment and Hospitality is Lavish, contact the Ethics Office for guidance.</p>
Legitimate Business Purpose	<p>Legitimate Business Purpose means any activity or objective that is directly related to the operations and goals of Worldpay and is conducted in a manner that is lawful, ethical, and reasonable. Business Entertainment and Hospitality must have a Legitimate Business Purpose to qualify as an Industry Event which means there must be an industry or market update program or presentation accompanying the event that is directly related to a Legitimate Business Purpose.</p>
Public Official	<p>Public Official is any public sector employee including those who hold a public office or position, such as a government employee, public figure, or other individual who has influence or authority over the Company's operations. This includes but is not limited to regulators, central bankers, members of parliament or Congress, diplomatic officials and ambassadors.</p>
Relatives	<p>Relatives include a spouse, domestic partner, child or stepchild, parent, parent-in-law, sibling, grandparents, a spouse's parents and grandparents, grandchildren, great-grandchildren, stepsiblings, half-sibling, uncles, aunts, nephews, nieces and cousins and anyone sharing the colleague's household.</p>
Strictly Prohibited Event	<p>Strictly Prohibited Event refers to any event or activity that is expressly forbidden due to its potential to create conflicts of interest, violate legal or ethical standards, or damage the</p>

	<p>Company's reputation. These events typically include, but are not limited to:</p> <ul style="list-style-type: none">• Adult Entertainment: Any event involving adult entertainment, such as strip clubs or other sexually explicit venues.• Gambling: Events that involve gambling activities, including casinos and betting for money.• Conflict of Interest Situations: Events that could create or appear to create a conflict of interest, such as those involving business partners during sensitive periods like contract negotiations or vendor evaluations.• Illegal Activities: Any event that involves illegal activities or activities which violate local, state, or federal laws. <p>Participation in Strictly Prohibited Events is not allowed under any circumstances.</p>
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Disclosure Application

Although the exchange of business courtesies such as Business Gifts or Entertainment and Hospitality can be a great tool for building good faith in a business relationship, they should never be—or even appear to be—an attempt to influence a business decision. In some cases, inappropriate or Lavish and excessive gifts may be viewed as commercial Bribery or be in violation of other laws, putting the Company and its reputation at risk. Business Gifts or Entertainment and Hospitality **must be infrequent** and **should not** exceed **500.00 USD** in a 12-month period to the same party. For meals and entertainment limits, refer to the relevant Travel Policy regarding Meals and Entertainment with Clients, External Parties, and Prospects.

Business Gifts or Entertainment and Hospitality accepted, or provided, must have a Legitimate Business Purpose, be consistent with Company values and policies, be infrequent, comply with all applicable laws and regulations, and not knowingly conflict with the policies of the recipient.

The following Business Gifts or Entertainment and Hospitality **must not** be given or accepted prior to entering them in the **Disclosure Application** for review and approval:

- Business Gifts exceeding 100.00 USD.

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- Any Business Gifts or Entertainment and Hospitality to a Government Official (except those given in accordance with the Worldpay China Entertainment and Marketing Expenses Guideline), regardless of the value.
- Business Gifts of Worldpay branded logo items which exceed 100.00 USD individually or 500.00 USD collectively.
- Business Entertainment and Hospitality exceeding 250.00 USD per person inclusive of all benefits relating to the Business Entertainment and Hospitality.
- Invitations to Industry Events where the cost for attendance is paid by a party other than Worldpay.

The following are **not** considered Business Gifts or Entertainment and Hospitality, and therefore, **do not need to be entered** in the Disclosure Application:

- Continuing professional education or development opportunities paid for by Worldpay.
- Reasonable business meals as defined within the relevant Travel, Entertainment and Business Expense Reimbursement Policy.
- Invitations to Industry Events where multiple clients or potential clients are invited, and which are open to the general public **unless** the cost for attendance is paid by a party other than Worldpay.
- Worldpay client events and marketing events, which are required to be planned and coordinated through the Worldpay Corporate Global Events and Marketing team.

Industry Events

Travel, lodging and related attendance expenses (e.g., Industry Event entry fees, meals during the Industry Event, ground transportation) incurred in connection with attendance at Industry Events may be paid for by the sponsors of such events if attendance at such events and the payment of related expenses has been approved in advance by an EVP or with respect to an EVP, the Chief Executive Officer (CEO). If the Chief Executive Officer is attending, the attendance and payment of related expenses needs to be approved in advance by the Board. In making its determination, the appropriate approving authority will consider a variety of factors, including the Legitimate Business Purpose of attendance at the event, any relationship Worldpay has with the sponsor and the potential conflict of interest and/or appearance of undue influence caused by the payment of travel, lodging and related expenses paid by the sponsor of an Industry Event.

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In the event a colleague is attending an Industry Event, and the colleague is permitted to bring a guest, the colleague is responsible for covering all costs, including transportation, for the guest to attend.

Prohibited Conduct

Colleagues should never:

- Solicit a Business Gift or Entertainment and Hospitality or any type of preferential treatment for a personal benefit or to influence a business decision.
- Exchange or offer Business Gifts or Entertainment and Hospitality with anyone who represents a company that is currently in contract negotiations with Worldpay.
- Offer or accept cash or cash equivalents such as gift cards, gift certificates, gas card, stocks, bonds, or stock options.
- Give or receive discounts not available to the general public.
- Offer or accept loans on terms not generally available to the public at large.
- Offer anything of value to a Government Official without prior approval from the Ethics Office.
- Accept any engagement requests for meetings with Government Officials or Public Officials without prior approval. An engagement with a Government Official includes but is not limited to meeting requests, inviting a Public Official to an event, or responding to a meeting invitation from a Public Official.
- Make, offer, promise, or authorize payments of money for the purpose of obtaining, retaining or furthering business activities or to influence or compromise the conduct of the recipient.
- Offer any Business Gift or Entertainment and Hospitality that would cause recipients to violate the policies or standards of their employer.
- Offer anything of value to a third-party, including any payments prohibited under the Worldpay Anti-Bribery Anti-Corruption (ABAC) Policy.
- Accept or offer an invitation to a Strictly Prohibited Event.

Participating in Strictly Prohibited Events or engaging in Prohibited Conduct is impermissible regardless of the value.

Returning or Declining Gifts or Entertainment and Hospitality

Colleagues should politely return Business Gifts or decline Business Entertainment and Hospitality that violate this Policy with an explanation that Company policy does not permit acceptance. If returning the gift would not be practical, cause embarrassment or would otherwise adversely affect the Worldpay business relationship with the offeror, a colleague may accept the gift on behalf of Worldpay and contact the Ethics Office at WorldpayEthicsOffice@worldpay.com for further guidance.

Authority for Approval of Exceptions

In limited circumstances, it may be appropriate to approve Business Gifts or Business Entertainment and Hospitality – except for Strictly Prohibited Events – that would otherwise be impermissible under this Policy. Exceptions to this Policy may be authorized as follows:

1. **CEO Authority:** The CEO has the authority to approve a Business Gift or Business Entertainment and Hospitality for an executive that would otherwise be impermissible under this Policy where acceptance serves a Legitimate Business Purpose. Such approvals must be documented and justified in writing outlining the reasons for the exception and the benefits to the Company.
2. **Executive Authority:** An executive has the authority to approve a Business Gift or Business Entertainment and Hospitality for a direct report that would otherwise be impermissible under this Policy where acceptance serves a Legitimate Business Purpose, provided that the approval is confirmed by the CEO. The executive must document and justify the reasons for the exception in writing, and the CEO must provide written confirmation of the approval.

For transparency, all exceptions will be reported to the board of directors on a quarterly basis.

Speak Up

An ethical culture is important to the Company and is integral for Worldpayers to Win as a Team and Act Like an Owner. Colleagues who learn of a violation or suspected violation of this Policy are required to Speak Up by reporting the conduct to:

- Their manager;
- The Worldpay Ethics Office at WorldpayEthicsOffice@worldpay.com;
- The [People and Culture Team](#); or
- [The Worldpay Ethics and Integrity Line](#).

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For more information on obligations to report wrongdoing, please review the Speak-Up Policy. Worldpay does not tolerate retaliation against anyone who, in good faith, reports a violation of Worldpay policy or the law or cooperates with an investigation.

Policy Roles & Responsibilities

Policy Owner: The Policy Owner is the Chief Ethics Officer who is responsible for the approval and for the oversight of the Formulation, Adoption, Implementation, Evaluation and Maintenance of the Policy. The Policy Owner may elect delegates in order to assist with the fulfilment of their responsibilities outlined in this Policy.

Policy Custodian: The Policy Custodian is responsible for the effective Formulation, Adoption, Implementation, Evaluation and Maintenance of the Policy, as well as the preparation of the Policy for approval by the Policy Owner in course of the respective review on a period determined by the tier, or where material changes are made. The Policy Custodian may engage their respective team and delegate to appropriate personnel to assist with the fulfilment of these responsibilities.

Cross Reference to Supporting Materials

This Policy has been established to address key risk objectives in respect of Business Gifts and Entertainment at Worldpay. In support of this Policy and the objectives it sets forth, other relevant documents are noted as follows: *Code of Business Conduct and Ethics; Conflicts of Interest Policy; Speak-Up Policy; Travel, Entertainment and Business Expense Reimbursement Policy; Employee Gifts, Prizes, and Awards Policy.*

Contributors

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Version Control

Document Status

Version	Status	Revision Date	Description
1.0	Final	March 2026	New Publication

Document Sign-off

Version	Date	Approved by
2.0	October 2025	Carrie Russell