



Speak Up Policy

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Summary of Key Policy Statements

Summary Reference	Summary Statement
SU – P1	Purpose and Scope: The Speak-Up Policy is designed to encourage prompt reporting of suspected wrongdoing, provide clear guidance on how to raise concerns, and reassure Reporters that genuine concerns raised in Good Faith will be protected. The policy applies enterprise-wide to all Worldpay legal entities, employees, contractors, consultants, and third parties acting on behalf of Worldpay.
SU – P2	Commitment to Ethical Conduct and Openness: Worldpay is committed to conducting business honestly, with integrity, and in accordance with its Code of Business Conduct and Ethics, maintaining a culture of openness, accountability, transparency, and trust. All colleagues are responsible for upholding these standards and protecting the integrity and reputation of the company.
SU – P3	Encouragement and Protection for Reporting: The policy encourages all employees, contractors, consultants, and third parties to promptly report suspected wrongdoing, illegal or unethical conduct, or violations of company policy, with the assurance that concerns will be taken seriously, investigated confidentially, and that Reporters acting in Good Faith will be protected from Retaliation – even if their concerns turn out to be mistaken.
SU – P4	Clear Reporting Channels and Confidentiality: Reports can be made orally or in writing to line managers, the People and Culture Team, the Ethics Office, or via the Worldpay Ethics and Integrity Line, with options for anonymous reporting where permitted by law. The company will make every effort to maintain confidentiality and only disclose information as necessary and proportionate for investigations.
SU – P5	Zero Tolerance for Retaliation: Worldpay has a zero-tolerance policy for Retaliation against anyone who, in Good Faith, reports wrongdoing or cooperates with investigations. Any form of Retaliation will result in disciplinary action up to and including termination, as permitted by local law.

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Policy Purpose

Our Policy intends to:

- **Encourage** reporting of suspected wrongdoing as soon as possible, with the knowledge that concerns will be taken seriously and investigated in a timely manner, and that confidentiality will be respected.
- **Provide** guidance as to how to raise those concerns.
- **Reassure** Reporters that genuine concerns may be raised in Good Faith without fear of reprisals or Retaliation, even if such concerns turn out to be mistaken.
- **Prevent/detect harm** to Worldpay and prevent financial loss and regulatory sanctions.
- **Demonstrate a commitment** to Worldpay's values, Code of Business Conduct and Ethics ("Code"), policies, laws, and regulations.

Policy Scope

This Policy applies to all Worldpay legal entities and affiliates ("Company"). It identifies how colleagues ("employees"), contract labor, consultants, and others acting on behalf of Worldpay can raise risks and concerns.

It also sets out how clients, customers, suppliers, business partners and other third parties may report irregularities or wrongdoing concerning Worldpay or its colleagues.

The **types of behavior that should be reported** include but are not limited to:

- Criminal activity;
- Failure to comply with any legal or professional obligation or regulatory requirements;
- Miscarriages of justice;
- Danger to health and safety;
- Damage to the environment;
- Bribery and/or corruption;
- Facilitating tax evasion;
- Financial fraud;
- Breach of our Code or other Company policies;
- Conduct likely to damage the Company's reputation or financial well-being;
- Unauthorized disclosure of confidential information;

- Negligence; and
- The deliberate concealment of any of the above matters.

This Policy does not apply to **personal** work-related grievances such as decisions relating to the terms and conditions of employment, suspension, termination, or performance evaluations. If a complaint relates to a colleague's own personal circumstances and does not involve a behavior identified above, colleagues should reach out to the [People and Culture Team](#).

If a complaint relates to a colleague's own personal circumstances but they also have wider concerns regarding one of the behaviors set out above (*i.e.*, a violation of the Code or other Company policies), colleagues are encouraged to engage with their management, the [People and Culture Team](#), or the [Ethics Office](#) to determine which route is the most appropriate.

For clients, customers, suppliers, business partners and other third parties, the Speak-Up Policy would not apply to commercial dissatisfaction arising from a contract unless it also involves a behavior identified above.

All colleagues are responsible for the success of this Policy. Colleagues are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions, and queries should be addressed to the **Ethics Office** at WorldpayEthicsOffice@worldpay.com.

Note: This Policy does not form part of any contract of employment or other contract to provide services and may be amended at any time.

Statement

Worldpay is committed to:

- Conducting business honestly and with integrity and high standards in accordance with our Code;
- Maintaining a culture of openness and accountability;
- Strengthening a culture of transparency and trust; and,
- Protecting the integrity and reputation of the Company.

Companies face the risk of things going wrong from time to time, or of unknowingly harboring illegal or unethical conduct. A culture of transparency and trust with accountability is essential to prevent such situations from occurring and to address them when they do occur.

If colleagues have any genuine concerns related to suspected wrongdoing or danger affecting any of Worldpay's activities, they are required to report it under this Policy.

In addition, clients, customers, suppliers, business partners and other third parties should raise concerns via the [Worldpay Ethics and Integrity Line](#) or contact the Worldpay Ethics Office at WorldpayEthicsOffice@worldpay.com.

Alignment to Risk Appetite

In accordance with Worldpay's Risk Taxonomy and the principles outlined in the Speak Up Policy, as endorsed by the Executive Risk Committee under delegated authority from the Board, Worldpay maintains a low appetite for Legal and Compliance Risk. This reflects the Company's strong commitment to compliance and ethical conduct, and its unwillingness to knowingly deviate from applicable laws, regulations, or card brand requirements.

Worldpay's exposure to Legal and Compliance Risk is primarily driven by obligations related to regulatory compliance, ethical reporting, and adherence to internal policies such as the Speak Up policy. These obligations are critical to maintaining trust with stakeholders and ensuring operational integrity.

This document sets forth a program by which Worldpay manages Legal and Compliance Risk, in alignment with the Company's low risk appetite. It emphasizes proactive compliance measures, robust internal controls, and a culture of transparency and accountability - ensuring that all employees are empowered to raise concerns without fear of Retaliation, and that such concerns are addressed in a timely and confidential manner.

Glossary of Terms

Term	Definition
Anonymous	Anonymous reporting is a process whereby individuals can submit a report without revealing their identity.
Anonymity	Anonymity is the condition of remaining Anonymous.
Good Faith	Good Faith means having reasonable grounds at the time a report is made, based upon the circumstances and information available, that the information in the report is true.
Reporter	Reporter is any person who raises information or reports a concern about illegal or unethical conduct in Good Faith. All Whistleblowers

	will be Reporters, but not all concerns will be Whistleblower Concerns.
Retaliation	<p>Retaliation in the workplace is when a Reporter is punished by the Company, a manager, a colleague, or other third-party for reporting illegal or unethical conduct that is legally protected. Retaliation can come in many forms of detrimental treatment, including lowering a colleague's pay, withholding a promotion, not hiring a colleague who cooperated as a witness, or terminating a colleague solely for raising a concern.</p> <p>Retaliation is not expecting colleagues to perform tasks in their job description, continuing to manage performance after a report is made, or disciplining a colleague for knowingly making a malicious or fraudulent accusation. In addition, reporting concerns does not protect a colleague from discipline for any misconduct learned in connection with the investigation or otherwise.</p>
Whistleblower	A Whistleblower is a person who raises Whistleblower Concerns in "Good Faith."
Whistleblower Concern	<p>Whistleblower Concern can encompass illegal activity and/or various types of behavior or wrongdoing as further listed as examples in this Policy's Scope section.</p> <p>Note: The disclosure of violations protected by European Union law is described further in the Appendix to this Policy.</p>

Making a Report

It is the responsibility of all colleagues to comply with the Code, Company policies, and the law, and to report violations or suspected violations in accordance with this Speak-Up Policy.

Managers have an even greater level of responsibility and must lead with integrity and reinforce the Company's ethical culture. They are often the first resource for colleagues who have questions on ethical issues or potential violations of Company policy, and national or international laws. They may be held responsible for their failure to report misconduct or to take steps to address or remediate an issue.

1. Colleagues should raise concerns orally or in writing with:
 - Their line manager;

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

Concerns raised to the Ethics and Integrity Line can be made anonymously where permitted under local laws.

If preferred, a face-to-face meeting can be arranged. Colleagues are asked to provide as much detail as possible to aid in a thorough investigation of their concerns.

2. Clients, customers, suppliers, business partners and other third parties should raise concerns via the [Worldpay Ethics and Integrity Line](#) or contact the Worldpay Ethics Office at WorldpayEthicsOffice@worldpay.com.

Confidentiality and Anonymity

Worldpay encourages Reporters to voice their concerns openly under this Policy. The Company will make every effort to only disclose the identity of the reporting person, and anyone mentioned in the reported concern, as necessary and proportionate in the context of the investigation. For any Whistleblower Concern under EU law, the identity of the Reporter will not be disclosed without their express consent.

The Company permits Anonymous reports, as per local laws, but encourages Reporters to disclose their identity if they feel comfortable doing so. While every effort will be made to investigate Anonymous reports, Anonymous reporting can limit the ability to fully investigate the matter. It may be difficult or even impossible to conduct a proper investigation if the Company cannot obtain further information from the Reporter.

Ethics Investigation and Outcome

The Company will acknowledge receipt of a concern raised to the Ethics Office within seven (7) days and will aim to provide further feedback to the Reporter within 90 days. The Company will respect any stricter time restrictions that apply to a Whistleblower Concern, such as those concerns raised under EU law.

All reported concerns will be assigned to an investigator by the Company. The investigator is selected based on relevant experience or specialized knowledge of the subject matter taking into consideration any potential conflicts of interest identified regarding the reported concern. Following the Ethics investigation, the Ethics investigator may make recommendations for change to enable

the Company to minimize the risk of future wrongdoing (i.e., process improvements, educational opportunities, potential risks, or control enhancements).

The Reporter should not conduct their own investigation, but they may be asked to assist with an investigation. Reporters are expected to cooperate with the Ethics investigation, and not interfere with it, offer false information, or alter or destroy records. All colleagues are obligated to cooperate with investigations and provide complete, accurate and truthful information whenever asked to do so.

The Company will aim to keep Reporters informed of the progress of the Ethics investigation and its likely time to completion. However, sometimes the need for confidentiality may prevent providing specific details of the Ethics investigation or the outcome or any disciplinary action taken as a result. Colleagues should treat any information about the Ethics investigation as confidential.

If the conclusion is that a Reporter has made allegations maliciously, the Reporter will be subject to disciplinary action up to and including termination, as per local law.

Protection and Support for Reporters

It is understandable that Reporters are sometimes worried about possible repercussions such as Retaliation. Worldpay aims to encourage openness and will support colleagues who raise concerns in Good Faith under this Policy, even if they turn out to be mistaken.

Worldpay encourages colleagues and others to 'Speak-Up' about any suspected wrongdoing and will not tolerate Retaliation against anyone who, in Good Faith, reports any wrongdoing, a violation of the Code, a Worldpay policy or the law or who cooperates with an investigation, regardless of whether such report is protected by law.

Global applicable Whistleblowing laws provide statutory protection from Retaliation for Whistleblowers who raise Whistleblower Concerns in Good Faith. Facilitators who assist in reporting or disclosure, natural persons and non-profit legal entities (unions and associations) and those who are related to, or surrounding, the Whistleblower and legal entities controlled by a Whistleblower may also be protected under applicable Whistleblower laws.

If a Reporter believes that they have experienced a form of Retaliation, they should inform the [People and Culture Team](#) or Ethics Office at WorldpayEthicsOffice@worldpay.com immediately. In addition, clients, customers, suppliers, business partners and other third parties should raise Retaliation concerns to the Worldpay Ethics Office at WorldpayEthicsOffice@worldpay.com.

The Company has a zero tolerance for Retaliation. Colleagues must not threaten or retaliate against Reporters in any way. Anyone involved in such conduct will be subject to disciplinary action up to and including termination, as per local law.

External Disclosures

The aim of this Policy is to provide guidance on the internal mechanism for reporting wrongdoing in the workplace. Colleagues are strongly encouraged to report any concerns internally so that Worldpay can investigate and resolve any issues.

In some circumstances, it may be appropriate to report concerns to an external body such as a regulator. Colleagues are protected by law from Retaliation where they report certain violations to an external party. The Appendix to this Policy sets out some of the Whistleblower Concerns that may be reported externally under EU law, together with the competent authorities in the EU member-states to which such reports may be made. Colleagues outside of Europe may also report externally in some circumstances.

Colleagues are not required to notify the Company that they have made such reports or disclosures or obtain authorization from the Company prior to making such reports or disclosures.

Data Privacy

Worldpay is committed to safeguarding the privacy of those involved in the Speak-Up process. The Company is subject to various privacy and data protection laws in the jurisdictions in which it operates. Worldpay established Company policies to protect and secure personal data, including, in particular, the Worldpay Privacy Policy. Any personal data obtained in conjunction with this Policy will be used for reasons outlined in this Policy or as otherwise permitted by data protection laws. For further information, please review the [Worldpay Privacy Center](#). For questions, please contact the Worldpay Privacy Office at worldpay.privacy@worldpay.com.

Retention of Records

Reports of violations or suspected violations will be kept confidential to the extent possible - including for the retention of records, consistent with the need to conduct an adequate investigation. Creating and maintaining accurate and complete data is essential for our ability to meet our business needs as well as legal and regulatory requirements.

The Company has adopted a Records Management Policy to establish uniform guidance regarding the retention and destruction of information and records in conformity with applicable laws which includes investigations. For further general questions about our Records Management Policy, contact the Worldpay Privacy Office at worldpay.privacy@worldpay.com. For any specific inquiries, please contact the Worldpay Ethics Office at WorldpayEthicsOffice@worldpay.com.

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 Speaking Up 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
- Records Management Policy

Contributors

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Ethics Office	Carrie Russell – SVP, Deputy General Counsel Senior and Chief Ethics Officer; Kelsey Joyce – Corporate Counsel I

Version Control

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1.0	Final	March 2026	New Publication

Document Sign-off

Version	Date	Approved by
2.0	October 2025	Carrie Russell

Appendix: External Reporting

Part A: Violations of European Law that May Be Reported Externally

Violations in the areas of:

- Public procurement
- Financial services, prevention of money laundering and terrorist financing
- Corporate tax
- Product and transport safety
- Environmental and nuclear safety
- Food and feed safety, animal health and welfare, and public health
- Consumer protection
- Protection of privacy, data protection and security of network and information systems
- Violations affecting the financial interests of the EU; and violations relating to the internal markets (including violations of EU competition and State aid rules).

The specific Whistleblower Concerns that may be reportable externally vary by member state.

Part B: EU Member-States Agencies to Whom Whistleblower Concerns May Be Reported

NOTE: The following information is required to be provided under EU law. Colleagues outside of Europe may also report externally in some circumstances.

Each EU member-state has designated competent authorities to whom Whistleblower Concerns may be made as follows:

Austria

- The Federal Office for Preventing and Combating Corruption
- Auditor Supervisory Authority
- Financial Reporting Authority
- Federal Competition Authority
- Financial Market Authority

- Money Laundering Reporting Office
- Notarial chambers
- Bar associations
- Chamber of Tax Advisors and Certified Public Accountants

Denmark

- Danish data protection authority

France

- Defender of Rights (defenseur des droits) plus others for specific sectors

Germany

- Federal Office of Justice plus authorities competent to oversee the regulated financial sector

Ireland

- The Office of the Protected Disclosures Commissioner (OPDC)

Italy

- National Anti-Corruption Authority

Netherlands

- Dutch Authority for Nuclear Safety and Radiation Protection,
- Dutch Whistleblower Authority,
- Netherlands Authority for Consumers and Markets (ACM),
- Netherlands Authority for the Financial Markets (AFM),
- Netherlands Data Protection Authority (AP),
- the Dutch Central Bank (De Nederlandsche Bank N.V.),
- the Inspectorate for Health and Youth Care (IGJ) or
- the Dutch Healthcare Authority (NZa).

Romania

- National Integrity Agency

Spain

- Independent Authority for the Protection of Informants (AAI)

Sweden

- Swedish Work Environment Authority is the authority with overall oversight over 30 competent authority