

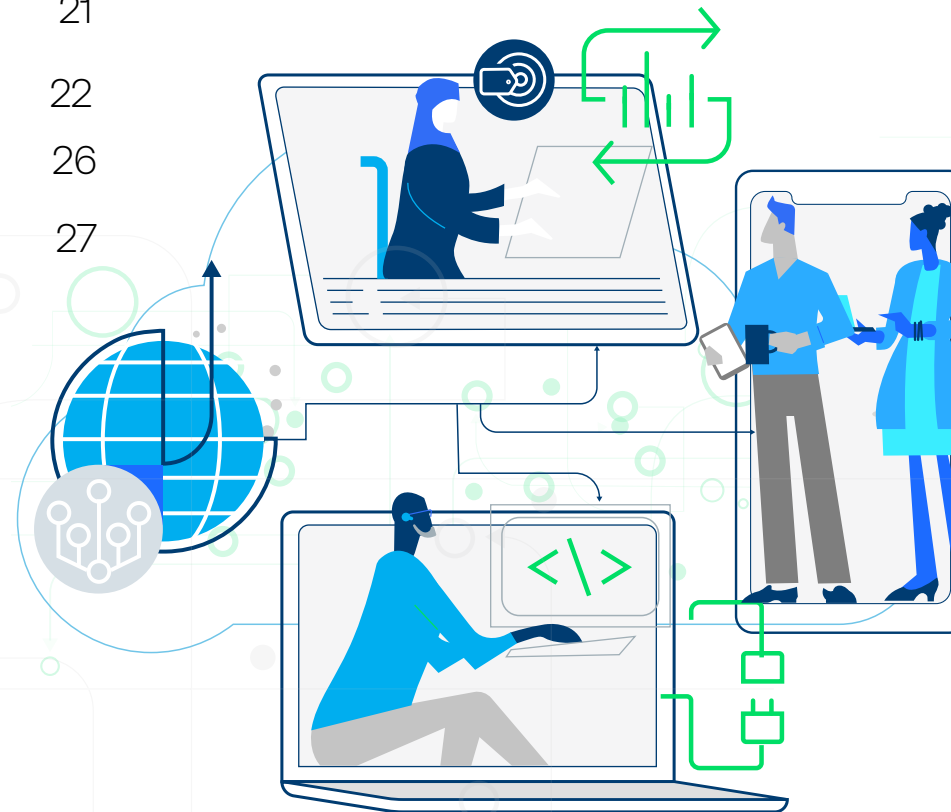


Code of **Conduct** **and Ethics**

UPDATED JANUARY 2024

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Message from **our CEO**

Global Payments is committed to upholding the highest standards of ethical conduct. These standards are an integral part of who we are and why our customers and partners choose to do business with Global Payments.

Our Code of Conduct and Ethics (the “Code”) is intended to give all employees, officers and directors the tools to respond to situations that might violate our standards and company expectations. It upholds our focus on personal accountability and our responsibility to doing the right thing as key parts of our mission and values.

Our commitment to excellence is fundamental to our corporate philosophy both at Global Payments Inc. and at our affiliated companies (“Global Payments”). Our employees, officers and members of our Board of Directors share a common set of objectives and benefit from the achievement of those objectives through ethical decisions and behavior.

Our continued success requires this firm commitment to maintain our company’s culture of integrity.



Cameron M. Bready

President and Chief Executive Officer

Our **Values**

People **Who Make A Difference**

We make the impossible possible and are driven to do great things for our business, our communities and each other.

Diverse **Perspectives**

We respect and value the differences of our employees. We believe unique viewpoints and experiences make us stronger and help us grow.

Trusted **Partnerships**

We demonstrate integrity and understand our stakeholders' priorities. We deliver on our promises, turning relationships into partnerships built on trust.

Business **Agility**

We embrace challenges and opportunities at every turn. We are ready to respond quickly to the ever-changing needs of our business.

Innovative **Thinking**

We deliver extraordinary value from creative ideas and solutions. Innovation powers everything we do.

Performance **Excellence**

We continuously raise the bar to exceed expectations. We hold ourselves accountable for exceptional results.



Diversity, Equity and Inclusion

We are fully committed and focused on creating a better tomorrow in the communities in which we live and work. We all have a role to play in building an inclusive and diverse culture. Diversity, like rapidly evolving technology or globalization, is critical to a successful business. Trends and changes in technology and global competition require constant adaptations and carry implications for organizational effectiveness and competitiveness. DEI is no different; it also requires adaptation and carries implications for organizational effectiveness and competitiveness.

To support the realization of our vision and demonstrate our commitment, we have established the following strategic objectives:

Diversity

Improve the representation of all underrepresented groups at every level of the organization by driving talent acquisition and management practices to achieve results.

Accountability

Hold leadership accountable to lead inclusively and equitably.

Inclusive Capability

Empower employees to adapt and shift their mindsets to create an inclusive and authentic culture.

Engagement

Actively listen and engage with our employees and communities.

Communications

Ensure that DEI initiatives, actions, and results are transparent to all key stakeholders.

External Relations

Engage various external stakeholder groups that support and serve Global Payments values and interests including our diverse suppliers.

This Code applies to all officers and employees of Global Payments around the world and members of our Board of Directors when they act in their capacity as directors. We refer to persons covered by this Code simply as “employees,” unless the context otherwise requires. Contractors, contingent, and temporary workers are also expected to be familiar with and comply with Company policies in the Code when acting on behalf of the Company.

Application of our Code

The Code is an extension of our values and reflects our commitment to the highest ethical standards. The Code is not an exhaustive statement of Global Payments policies and does not cover every situation that may arise, nor establish every rule. When faced with questions beyond those addressed in the Code, you are expected to follow both the spirit and letter of the Code and Company policies that govern the issue.

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 or any of its affiliates. 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 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 U.S. 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.

This Code is reviewed annually and updated as needed.

Compliance with the Code

We all have a responsibility to understand and follow this Code. You are expected to perform your 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.

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.

Directors should promote ethical behavior and take steps to see that the Company:

- Encourages employees to talk to supervisors, managers, and other appropriate personnel when in doubt about the best course of action in a particular situation;
- Encourages employees to report violations of laws, rules, regulations, or the Code; and
- Informs employees that the Company will not permit retaliation for reports made in good faith.

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

Reporting **Suspected Non-Compliance**





General Policy

At Global Payments, we believe that all employees should feel empowered and responsible to speak up, particularly with respect to ethical concerns. If you are aware of or suspect any of the following, you have 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.

Complaint Procedure

Reports can be made by contacting any of the following:

General Counsel	404.926.9735
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. Anonymous reports can also be made by telephone.

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

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.

Policies and Practices



Conflicts of Interest

We all have a duty of loyalty to Global Payments and must make every effort to avoid conflicts of interest.

What is a conflict of interest?

A conflict of interest occurs when your personal interest (or the interest of a member of your family) interferes or conflicts, or even appears to interfere or conflict, with the interests of Global Payments. Conflicts of interest can arise in many situations, including through personal relationships with family and friends, financial interests in companies that do business with Global Payments, and business opportunities that you may learn about through your position at Global Payments. Even an apparent conflict of interest can hurt the Company's business and reputation. An apparent conflict of interest is a situation where an observer might conclude that your judgment

was influenced by something other than the Company's best interest. **For example, if you have a personal or financial relationship with a Company vendor, it may appear to others that you are giving the vendor preferential treatment—even if you don't.**

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.

Disclosure is Mandatory

Having a conflict of interest is not necessarily a Code violation, but failing to disclose it is.



Guidance for **Employees, Directors and Executive Officers**

Think you have a conflict?

Even an apparent conflict of interest can hurt our Company's business and reputation.

Employees: You are required to discuss any situation in which you are involved or plan to become involved which could result in an actual, potential or apparent conflict of interest with, and seek 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.

Directors and Executive Officers: Directors and executive officers must avoid circumstances which might cause them to place their own interests above their obligations to the Company. You must promptly disclose any situation that involves, or may involve, a conflict of interest to the Chairperson of the Board and the Chairperson of the Governance and Nominating Committee.



Gifts and 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, is permissible as long as it is:

- customary in scale, expense and frequency;
- in an appropriate setting;
- in furtherance of a business relationship; and
- not intended, or doesn't appear to, improperly influence a business decision.

Q&A

Question: A vendor offers you an all-expense paid trip to a championship sports event and the trip has no valid business purpose. To avoid offending the vendor, you initially accepted the gift. What should you do now?

Answer: Without a valid business purpose, 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 Company personnel.

Global Payments expects every employee, officer and director to read the Company's Anti-Corruption Policy which describes appropriate ways to manage certain payments, third parties, business activities, conflicts of interest and record keeping.

Some examples of gifts that might create a conflict of interest or the appearance of one 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)
- Travel or accommodations in connection with entertainment
- Interest-free loans
- Tickets to sporting or theater events of other than nominal value
- Internship or job opportunity

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

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?

Gifts to government officials

Before entertaining or giving any item of value to a government official, you must confirm the 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.

Loans or Personal Guarantees

Loans or guarantees by Global Payments of employees, officers or directors 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.

Interests in Other Businesses

You may not make or maintain an investment in a competitor, customer or supplier of Global Payments without the prior written approval of the General Counsel or, if you are a director, the Chairperson of the Board and the Chairperson of the Governance and Nominating Committee. 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.

Outside Employment and Activities

Employees must disclose to the General Counsel or to the Chief Executive Officer if such employee (or a member of their 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 they 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.

Corporate Opportunities

You are expected to advance Global Payments' interests when the opportunity arises. This means that you 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



Protection and Proper Use of **Company Assets**

We all must protect Company assets from loss, theft, damage, or unauthorized use or disclosure. Company assets include tangible assets (such as computer equipment and furniture) and intangible assets (such as confidential information and data). 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 Company personnel, 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.

Protecting company assets while working remotely

While working remotely, you should take special care to protect Company assets and safeguard all Company data, including confidential and proprietary information. All requirements and guidance related to protecting assets and data in this Code apply to all remote work locations. Working remotely may contribute to a more casual approach to protecting assets and data, so employees should remain vigilant and take reasonable steps to secure and safeguard their workspace, assets and data while working remotely.

The obligation to protect the Company's funds is particularly important. You should only spend money in accordance with applicable policies, including our Corporate Expense Policy and Guidelines.

Use of telephone lines, fax machines, computers and 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.

Strictly Prohibited

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

You 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 a 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.

Return of company property

You are responsible for all Company property or documents issued to you. You must return all such property and documents immediately upon request or termination of employment. Failure to promptly return Company property or documents upon request may result in civil or criminal action against you.

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

Protection and Proper Use of **Company Assets**

(cont.)

Intellectual property

We all 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.

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.

Confidentiality

You must maintain the confidentiality of information entrusted to you 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.

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?

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.

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

Artificial Intelligence

As technology continues to advance, the use of generative artificial intelligence (AI) in the workplace has become increasingly prevalent. While AI can provide many benefits, it also presents potential risks and challenges.

The use of AI for processing or analyzing confidential information is strictly prohibited without explicit authorization from the Legal Department and approval from the Architecture Review Committee (ARC). Unauthorized use of AI is a violation of Company policy and may result in disciplinary action.

When considering whether it is appropriate to use AI tools in your work, employees should review the applicable Company policies, including the Internal Privacy Policy and the accompanying Confidential Information Standard, Identifying Personal Information Standard, and Acceptable Use Standard.

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

Any employee who believes that they are 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 the 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.

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.

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 and 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.

Compliance With **Laws and Company Policies**

No employee 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

You 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.

You 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 your 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 and data protection

Employees are entrusted with the responsibility to properly handle sensitive information about Global Payments, our customers, consumers who have a business relationship with our customers, and 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. You should not handle Personal Information unless you have a legitimate business purpose for doing so and you have taken steps to confirm you are in compliance with relevant policies. As a global company, we take care to build processes and implement tools that enable compliance with the laws of each jurisdiction in which we operate and to maintain that compliance when data is transferred from the country in which it was created or collected.

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 guidance about how to handle Personal Information, refer to the Internal Privacy Policy available on teamGP or the applicable local intranet site. You can also contact the Privacy Office for a copy or for questions about how to implement the guidance.

The Privacy Office maintains resources to help you understand how the ever-changing privacy and data protection regulations apply to our products and services. You can access those resources on teamGP or contact the Privacy Office at privacychampions@globalpay.com.

Examples of personal information include,
but are not limited to:

- Name
- Address
- Date of birth
- Personal email address
- Social security number
- National identification number

To learn more about when data should be treated as Personal Information, consult the **Identifying Personal Information Standard** available on teamGP or contact the Privacy Office or your local Data Protection Officer (DPO).

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, you 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 and supply chain

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 or supply chain. 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. For more information outlining the steps we have taken on our ongoing planned efforts to prevent modern slavery in our Company and supply chain, please review our **Slavery and Human Trafficking Transparency Statement** posted on our external website at www.globalpayments.com

Sanctions and 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.

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.



Q&A

Question: Our 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.

Bribery and corruption

We are committed to compliance with the anti-corruption and anti-bribery laws of all countries and territories in which we operate or market our services. No business deal can ever justify putting our reputation at risk and integrity is at the heart of everything we do.

Under our Anti-Corruption Policy, Company personnel and those acting on behalf of the Company are prohibited from giving, offering or promising anything of value to any person for the purposes of causing that person to perform their duties disloyally or improperly influencing official action, or obtaining an unfair or improper business advantage for or on behalf of the Company. Specifically, you are prohibited from giving or offering a bribe, receiving or requesting a bribe, or bribing a governmental official. For more detailed discussion, see the Company's Anti-Corruption Policy available on our intranet site or from your regional compliance officer.

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.

If you suspect that any of Global Payments’ SEC reports, press releases or other public disclosures contain a material inaccuracy or omit a material fact that renders the disclosure misleading or if it involves a questionable accounting or auditing matter, you should immediately contact your manager, the General Counsel or utilize the EthicsPoint® line or website as described in the Reporting Suspected Non-Compliance section of this Code to report the matter with the option to do so anonymously.



Waivers of the Code

Only our Board of Directors (or a designated committee of the Board) may waive a provision of the Code for a Board member or an executive leadership team member, and we will promptly disclose any waiver granted as required by law. Our General Counsel may waive a provision of the Code for all other employees. Waiver of a specific provision of this Code shall not operate as a waiver of other requirements of this Code.



Resources

The following are useful addresses and telephone numbers:

General Counsel

Dara Steele-Belkin

EVP and General Counsel

Dara.steele-belkin@globalpay.com

404.926.9735

3550 Lenox Road Atlanta, GA 30326

Compliance

Jack Marr

EVP, Risk and Compliance

Jack.Marr@globalpay.com

Worldwide: worldwide.compliance@globalpay.com

Asia Pacific: APCompliance@globalpay.com

Canada: Canadian.Compliance@globalpay.com

Australia: ezi.compliance@ezidebit.com.au

Europe: compliance@globalpayments.cz

Internal Audit

Scott Tucker

Chief Audit Executive

Scott.Tucker@globalpay.com

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5995 Windward Parkway, Alpharetta, GA 30005

Privacy

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3550 Lenox Road Atlanta, GA 30326

Media Relations

Emily Edmonds

VP External Communications

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770.829.8755

3550 Lenox Road Atlanta, GA 30326

Investor Relations

Winnie Smith

SVP, Investor Relations and Corporate Sustainability

Investor.Relations@globalpay.com

770.829.8478

3550 Lenox Road Atlanta, GA 30326

Human Resources

Andrea Carter

SEVP, Chief Human Resources Officer

Andrea.Carter@globalpay.com

404.926.9822

3550 Lenox Road Atlanta, GA 30326

Global Payments EthicsPoint® Line

Calls within the United States or Canada:

1.866.384.4277

Website submission at: www.ethicspoint.com

For a complete list of country access codes for Global Payments EthicsPoint® Line, see the EthicsPoint® website at www.ethicspoint.com



Innovation that delivers.

About Global Payments

Global Payments Inc. (NYSE: GPN) is a leading payments technology company delivering innovative software and services to our customers globally. Our technologies, services and team member expertise allow us to provide a broad range of solutions that enable our customers to operate their businesses more efficiently across a variety of channels around the world.

Headquartered in Georgia with approximately 27,000 team members worldwide, Global Payments is a Fortune 500® company and a member of the S&P 500 with worldwide reach spanning over 170 countries throughout North America, Europe, Asia Pacific and Latin America. For more information, visit www.globalpayments.com and follow Global Payments on [Twitter \(@globalpayinc\)](#), [LinkedIn](#) and [Facebook](#).

