Global Payments Inc.

Conflict Minerals Policy

On August 22, 2012, the U.S. Securities and Exchange Commission ("SEC") adopted final rules implementing the "conflict minerals" reporting obligations under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.

These rules require that all publicly traded companies report annually to the SEC on the presence of "conflict minerals" in the products they manufacture or contract to manufacture, and demonstrate the proper level of due diligence in determining whether these minerals originated from "covered countries." The definition of "conflict minerals" refers to gold, columbite-tantalite (coltan), cassiterite, wolframite, and their derivatives, tantalum, tin and tungsten, regardless of where they are sourced, processed or sold. The definition of "covered countries" refers to the Democratic Republic of the Congo, Republic of Congo, Angola, Burundi, Central African Republic, Rwanda, South Sudan, Tanzania, Uganda or Zambia.

As a company that contracts to manufacture products that may contain gold, tantalum, tin, or tungsten, which at the time of the implementation of this policy Global Payments Inc. ("Global Payments") believes to be limited to the manufacture/production of credit, debit and prepaid cards, Global Payments is committed to sourcing materials from responsible suppliers.

Global Payments will take all necessary steps to comply with the SEC's regulations and is committed to implementing the requisite processes and supply chain due diligence to meet our disclosure obligations.

Any conflict minerals disclosures that Global Payments is required to make to the SEC for any calendar year will be publicly available on our website after May 31 of the following year.