

Political Activity Policy

Global Payments is committed to participating in the political and public policy process in a responsible and ethical way that serves the best interests of our shareholders, employees, customers and the communities in which we operate. Our priority is to comply with all federal, state, and local requirements associated with participating in policy making and the political process, and we have established specific controls and oversight mechanisms for these activities.

Scope: This Policy applies to all directors, officers and employees of Global Payments Inc. and its subsidiaries (collectively, “Global Payments” or the “Company”).

Global Payments Political Action Committee: Global Payments sponsors a non-partisan political action committee (“PAC”) that is registered with the Federal Election Commission. The PAC makes political contributions on a bipartisan basis to political parties, political committees and candidates who understand the legislative and regulatory issues that are important to the Company and share our values and goals. Contributions made by the PAC are not funded by corporate funds. The PAC is overseen by an Executive Committee that consists of senior executives of the Company. Participation in the PAC is entirely voluntary and is open by invitation to U.S.- based salaried employees of Global Payments at the director-level and above, members of the Board of Directors in compliance with Federal Election Law, and certain professional-level employees. Donors must also be U.S. citizens or hold a green card.

The PAC complies with all applicable laws concerning political contributions, including laws requiring public disclosure of such contributions. All contributions made by the PAC are reported in filings with the Federal Election Commission and are publicly available on the commission’s website (<http://www.fed.gov>). For convenience, Global Payments also provides an annual report of PAC contributions on its website.

Corporate Political Contributions: Corporate political contributions, whether monetary or in-kind, are prohibited unless pre-approved in advance by the Company’s Chief Executive Officer or General Counsel. Corporate political contributions are determined on the basis of Global Payments’ best interests and not on the personal interest of any individual officers,

directors, employees or other parties. Where approved under this Policy, Global Payments may contribute corporate funds to candidates and committees based on applicable law.

Political Contribution Considerations: No single issue or criterion determines whether a candidate or committee receives a contribution. In considering a political contribution under this policy, the following nonexclusive factors may be considered: whether a candidate shares an interest in understanding our Company, our industry, and issues crucial to our success; whether the Company has facilities or operations in or near a candidate's district or state; whether a candidate is a member of congressional or state legislative leadership; whether a candidate serves on a committee with jurisdiction over issues that are important to the Company; and whether a candidate exhibits a willingness to engage in constructive dialogue with colleagues regardless of party affiliation. No contribution is based on the personal political preference of any officer, director, employee, or other party affiliated with the Company.

Individual Employee Political and Civic Activity: Employees must not suggest or imply they are acting on behalf of the Company when making a personal political contribution or engaging in personal political activities. Employees participating in the political process with their own funds and/or through voluntary activity on their own time must refrain from making political contributions in expectation of or in exchange for the receipt of any favors or benefits. The Company cannot and will not reimburse anyone for expenses that are incurred in connection with an individual's political activity.

Trade Associations: Global Payments is an active participant in a variety of local, state, national and international industry and trade associations. These associations provide an array of services and benefits to the Company and our employees, to include professional development and education, networking and marketing opportunities, news updates, and in some instances, policy advocacy. Global Payments' membership in a trade association does not mean that the Company supports every position taken by the organization or its other members. Global Payments carefully considers trade associations and policy oriented organizations prior to joining and regularly reviews its principal memberships to assess their alignment with the Company's values and priorities.

Lobbying: Global Payments engages on a bipartisan basis on policy issues that directly impact Global Payments and the payments industry. The Global Payments Government Relations team is responsible for coordinating the Company's policy interactions with elected officials and

legislative bodies. A report on policy engagement is provided annually to the Governance and Nominating Committee of the Board of Directors.

Compliance and Oversight

Global Payments' participation in the political and public policy process is subject to oversight by the Governance and Nominating Committee of the Board of Directors. The Governance and Nominating Committee reviews and discusses with management at least annually Global Payments' policy engagement and political contributions and expenditures, if any.