

Statement on the TSYS Political and Legislative Participation Program

Every single day TSYS makes it possible for millions of buyers and sellers to move money around the world with trust and confidence. Part of this trust and confidence is attributable to our deep commitment to meaningful corporate governance practices and good corporate citizenship. TSYS demonstrates this commitment by acknowledging a responsibility to our customers, employees, retirees and shareholders to participate in the democratic process and to create a collective voice that helps to protect their interests. By engaging with other stakeholders in the legislative process, TSYS establishes this unique voice.

Like many other participants in the Financial Services and Payments industries, TSYS' ability to create value for shareholders is greatly dependent on the regulatory and political environment. To succeed in this environment, TSYS must actively monitor and assess ongoing legislative efforts at the federal, state, and local levels and advocate policies that simultaneously foster growth, promote stability, and improve our communities. TSYS accomplishes these goals through a variety of means, including the activities of our full-time Government Relations team and by taking an active role within various trade organizations.

As stated in the *TSYS Code of Business Conduct and Ethics*, we value and encourage citizenship. TSYS Team Members have the opportunity, as individuals, to support with contributions the political candidates of their choice.

TSYS PAC Management: The TSYS PAC is a voluntary committee made up of certain officers, managers, and professional employees of TSYS and its segments, subsidiaries, and affiliates. Participants in the TSYS PAC make voluntary contributions to a fund, which supports candidates for federal and state elective office. Day-to-day operations of the TSYS PAC are administered by the Treasurer of the TSYS PAC. The Treasurer is responsible for the solicitation of contributions to and the disbursement of funds from TSYS PAC consistent with applicable law and the TSYS PAC By-Laws. Further information about the TSYS PAC can be found on the Federal Election Commission's public website at <http://www.fec.gov/fecviewer/CandidateCommitteeDetail.do?candidateCommitteeId=C00441980&tabIndex=1>

Compliance: TSYS' highest priority is to fully comply with all federal, state, and local requirements associated with participating in the policy making and political process. This compliance includes reports to the Federal Election Commission on receipts and disbursements from the TSYS PAC and disclosure reports regarding Government Relations Advisors in accordance with the Lobbying Disclosure Act (LDA).

Corporate Expenditures: Under United States law, TSYS may not contribute corporate funds or make in-kind contributions to candidates for federal office. Any corporate political contribution to state or local candidates, political party organizations, political action committees, or referendum campaigns must be approved by the TSYS General Counsel. As a matter of policy, TSYS does not spend corporate funds directly on independent expenditures, nor do we contribute to independent-expenditure committees ("Super PACs," for example) as part of our political contributions program. In the event, however, that

circumstances arise that would warrant such a contribution, a recommendation would be made by the TSYS Government Relations Department and reviewed and approved by the TSYS General Counsel and/or the TSYS CEO.

Trade Associations: TSYS is an active participant in many financial services industry trade associations, including the Financial Services Roundtable (FSR), the Electronic Transaction Association (ETA), the National Branded Prepaid Card Association (NBPCA), and the American Bankers' Association (ABA). These trade associations provide opportunities for education, networking, and other business-related activities.

We make payments to these organizations and groups, including membership fees and dues. Staff in our Government Relations Department review and recommend approval to the TSYS General Counsel for all memberships to ensure that they are consistent with TSYS strategic goals and our public policy objectives. Trade associations, however, may also take positions on various legislative and regulatory issues. TSYS' participation in a particular trade association should not be considered a general approval of the positions taken by that association on an issue of public importance.

A comprehensive report on our memberships, including membership fees and dues paid in excess of \$30,000, is reviewed by our General Counsel on an annual basis. Dues attributable to lobbying by United States trade associations are included in the quarterly reports we file pursuant to the LDA.

Team Members' Personal Political Activities: As stated in the *TSYS Code of Business Conduct and Ethics*, our Global Citizenship program is our commitment to doing our part to make our world a better place. TSYS Team Members have the opportunity, as individuals, to make contributions to the political candidates of their choice, using their personal resources and subject to any applicable legal restrictions.

Board Oversight: The Corporate Governance and Nominating Committee of the Board of Directors, which is composed of independent directors, provides oversight of the implementation of policies, and processes outlined in TSYS' Political and Legislative Participation Program. TSYS' participation in the political and legislative environment is bipartisan, and all activities are transparent, subject to board oversight, and of the highest ethical standards as outlined by all governing laws.

Approved - December 2015