



Visa Supplier Code of Conduct

As a global payments company connecting consumers, businesses, financial institutions, and governments in more than 200 countries and territories, Visa Inc. and its subsidiaries (“Visa”) are committed to conducting business ethically and with integrity. Visa values responsible business conduct in its global operations and expects its Suppliers to share our commitment to these principles.

The Visa Supplier Code of Conduct outlines the expectations Visa has of its Suppliers. A “Supplier” is any business, company or other entity that provides, or seeks to provide, any kind of good or service to Visa, and includes the Supplier’s employees, directors, agents, subcontractors, and other representatives. The Supplier Code of Conduct goes beyond compliance with local law and is based upon universal principles that align with Visa’s values globally; therefore, it applies to all Visa Suppliers, regardless of location. To the extent that the Supplier Code of Conduct conflicts with an applicable Master Services Agreement, the Master Services Agreement controls, Visa’s previous Standards of Conduct are now replaced by this Supplier Code of Conduct. To ensure awareness of the Visa Supplier Code of Conduct, Suppliers are also responsible for communicating and training their staff, subcontractors and other representatives about these principles. Failure to meet the Visa Supplier Code of Conduct expectations may affect current and/or future business with Visa.

Legal Compliance and Governance

Suppliers must be committed to operating in full compliance with all applicable laws, including but not limited to anti-money laundering, anti-terrorist financing, anti-corruption, antitrust and competition laws. Suppliers must also assist Visa in its compliance with the economic sanctions and export control laws of the United States and other jurisdictions.

Winning business through fair and honest competition is of utmost importance to Visa. A Supplier must never promise anything of value to influence a business decision. Suppliers must not tolerate, permit, or engage in any form of corruption, extortion, bribery, or similar misconduct. This is true whether the Supplier is working with government officials or individuals in the private sector.

Protection of Confidential Information and Visa Property

Visa’s intellectual property is an important asset and critical to our business. Suppliers should understand its importance and protect Visa’s intellectual property accordingly. Suppliers are expected to safeguard confidential Visa information. If a Supplier has access to confidential Visa information, it is to be used only in a manner permitted by Visa and protected at a minimum with the same care in which the Supplier safeguards its own information.

Suppliers should also respect Visa physical and electronic assets and use them appropriately for business purposes. Suppliers must wear badges on Visa premises where required by Visa for security purposes and adhere to Visa security protocols. Suppliers are not permitted to publically disclose Visa as a client or use the Visa name, logo, or trademark unless authorized to do so.



Conflict of Interest

At Visa, we are transparent in our business dealings and avoid situations that put our individual interests in conflict with those of Visa or lead others to question our business objectivity. As a Supplier to Visa, any conduct or relationship that could present an actual or perceived conflict with Visa's interests should be disclosed to Visa. A conflict of interest might include, for example:

- Significant ownership or other substantial financial interest in a payment services company or any entity that stands to benefit from the Supplier's business relationship with Visa.
- A Supplier offering a Visa employee a consultancy, directorship, freelance commercial opportunity, or other financial or professional opportunities.
- A Supplier's employment of or close connections to a covered government official who has influence over matters that could reasonably be expected to affect Visa business.

A significant financial interest is any economic interest, including any interest as an owner, partner, stockholder, or holder of debt that might influence or appear to influence judgment. Investments that amount to 1% or more of the outstanding shares of a publicly traded company, or that are of such a dollar amount or percentage of net worth that could reasonably create the perception of a conflict, are generally considered significant.

Gifts, Meals, Travel, or Entertainment

A Supplier is prohibited from offering or providing any gifts, meals, travel or entertainment ("GTE") to Visa or Visa staff or on behalf of Visa or Visa staff for any purpose that is unlawful, unethical, or improper. Although gift giving is common in some parts of the world, caution must be taken; no GTE may be given to Visa staff while a deal is being negotiated. The giving or receiving of cash or a cash equivalent as a business gift to Visa or Visa staff or on behalf of Visa or Visa staff is also prohibited. Subject to the requirements above, GTE that is reasonable, appropriate, does not exceed USD 150 in value, and does not violate applicable law is acceptable.

Engagement with Visa Global Sourcing

Suppliers must be mindful that although they interact with various members of Visa staff to provide support for ongoing projects and services, Visa Global Sourcing staff manages spend and engagements with Suppliers. As such, a Supplier should engage Visa Global Sourcing staff as a first point of contact for all new and potential business or any related activity.

Human Rights

Visa is committed to respecting human rights. Our commitment includes identifying, preventing and mitigating any adverse human rights impacts of our activities where possible. We expect our Suppliers to share the same respect for human rights, including those principles recognized in international human rights standards such as the [Universal Declaration of Human Rights \(UDHR\)](#). Suppliers' approaches to human rights should be consistent with the [UN Guiding Principles on Business and Human Rights](#). Suppliers must comply with all applicable legal requirements related to human rights. When local laws are in conflict with international human rights standards,



suppliers should comply with the law while seeking to advance the underlying principles of the Visa Supplier Code of Conduct.

Employment Laws/Workplace Relations

Visa is committed to ensuring a safe, fair, respectful and inclusive workplace for our employees around the globe, and we value the individual differences, backgrounds, experiences and capabilities of each employee. We expect our Suppliers to share this commitment and uphold the principles laid out by the International Labour Organization's (ILO) [Declaration on the Fundamental Principles and Rights at Work](#).

Visa is committed to ensuring modern forms of slavery and human trafficking are not present in our supply chains and in our business. Suppliers must comply with all applicable laws related to human trafficking and the prevention of modern forms of slavery. Visa promotes a "no tolerance" standard when it comes to the use of forced, compulsory, or child labor. Suppliers must comply with applicable wage and hour labor laws and regulations and should ensure appropriate work hours and pay fair wages in line with [ILO standards](#).

Suppliers are expected to provide and foster a diverse and inclusive workplace. Visa promotes a "no tolerance" standard with respect to discrimination and harassment in the workplace. This includes prohibiting any form of harassment, victimization, or discrimination on the basis of characteristics unrelated to job requirements that are protected by law, such as race, color, sex, sexual orientation, gender identity or expression, religion, age, marital status, national origin, ancestry, pregnancy or maternity, medical condition, citizenship, and physical or mental disability.

Suppliers should respect the rights of their employees to form, join, or not join a labor union. Where such rights are prohibited or restricted by law, Suppliers should nonetheless be committed to an open and constructive dialogue with their employees and, if applicable, their representatives.

We expect all Suppliers to provide a safe, secure and healthy work environment for their staff. Suppliers must adhere to all applicable laws relating to health and safety in the workplace. Suppliers should have standards that prevent the use of illegal drugs at work and prevent behavior that appears to be intimidating, violent or threatens the health or safety of employees or others.

Environmental

Visa recognizes the importance of understanding and minimizing the environmental footprint of our payments ecosystem. Suppliers must abide by applicable laws regarding the environment wherever they operate. In addition, Suppliers should commit to operating in an environmentally responsible manner, including reducing, measuring and reporting on their environmental impact. This may include conserving natural resources and minimizing their own supply chain's impact on the environment.

Supplier Diversity

Visa recognizes the value of a diverse supply chain. Suppliers should support diverse businesses throughout their own supply chains, providing these businesses with a fair opportunity to bid and acquire contract opportunities. Suppliers should also support Visa's own supplier diversity initiatives, including providing relevant reporting.



Questions or Concerns

Visa expects Suppliers to establish effective grievance mechanisms to receive and respond to concerns relating to the topics discussed in this Supplier Code. In addition, if you have any questions or wish to report a concern, you may reach out to Visa directly.

Questions

Global Sourcing

GlobalSourcing@visa.com

To report a concern or suspected violation

Visa Business Conduct Office

BusinessConduct@visa.com
or 1-888-289-9322

If you are calling from outside of the United States, use the AT&T International Toll-Free Dialing codes web page (<http://www.att.com/esupport/traveler.jsp?tab=3>) to identify your local toll-free number.