



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 a Supplier’s contract with Visa, the contract controls. 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, and Visa reserves the right to conduct audits to ensure compliance with the Supplier Code of Conduct.

I. Legal Compliance and Ethical Operating Practices

Compliance with Laws

Suppliers must be committed to operating in full compliance with all applicable laws, including but not limited to human rights, labor and wage laws, anti-money laundering, anti-terrorist financing, anti-corruption, privacy and information security laws, anti-tax evasion, and antitrust and competition laws. Suppliers must also comply with and 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. Suppliers must comply with applicable anti-bribery laws and 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.

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:

- Ownership or other financial interest/investment in a payment services or related 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 of a Supplier's employee to a covered government official who has influence over matters that could reasonably be expected to affect Visa business
- A Supplier's employment of someone who has a close connection with a Visa employee (through prior employment or a close relative*) who is in a leadership role or involved in a decision-making role regarding the Supplier

* A Close Relative is a parent, child, spouse, domestic partner, sibling, stepparent, stepchild, grandparent or grandchild, aunt or uncle, niece or nephew, in-law or other significant relationship.

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. 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. Although gift giving is common in some parts of the world, caution must be taken; giving gifts with the appearance or intention of influencing decisions or conduct is strictly prohibited.

Subject to the requirements above, GTE that is reasonable, appropriate, and 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 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.

II. Protection of Visa Intellectual Property and Confidential Information

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 with 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 publicly disclose Visa as a client or use the Visa name, logo, or trademark unless authorized to do so.

III. Human Rights and Modern Slavery

Visa is committed to respecting human rights and operating responsibly by establishing high ethical standards across our company. Our commitment includes identifying, preventing and mitigating any adverse human rights impacts of our activities where possible. We will not tolerate any forms of slavery, servitude, exploitation, child labor, forced labor, or human trafficking in our business. 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.

IV. 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](#).

Suppliers are expected to provide and foster a diverse and inclusive workplace. Visa is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any form of discrimination, harassment, or retaliation in the workplace. This includes prohibiting any form of harassment, victimization, or discrimination on the basis of characteristics 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 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 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 substances at work and prevent behavior that appears to be intimidating, violent, or threatens the health or safety of employees or others.

V. Environmental

Visa believes in the importance of helping to protect our planet and natural resources and supporting climate action. We strive to use our products, services, network, expertise, brand and partnerships to minimize the environmental footprint of our operations, inspire and empower sustainable commerce and support the global transition to a low-carbon economy. Visa is carbon neutral for our operations and purchases 100% renewable electricity for our global facilities and data centers. We've set a net-zero target to eliminate the footprint from our scopes 1, 2, and 3 emissions by 2040 and an interim 2030 science-based target, both of which include our supply chain emissions. We report our emissions and our progress through the Carbon Disclosure Project (CDP) and in our annual ESG report, and we believe that transparency is important to address the climate crisis.

In support of our climate goals, Visa expects Suppliers to have similar commitments and practices. Specifically, we expect Suppliers to measure their greenhouse gas emissions and to set their own science-based climate targets and to disclose those emissions and targets through the CDP and through other scorecards or tools that we may employ to help understand and report on our emissions. Furthermore, we ask Suppliers to evaluate the potential adverse impacts of climate change, nature loss and water stress on their operations and their financial results and ensure that associated risks are properly managed.

VI. Supplier Diversity

Visa is committed to the development and utilization of diverse businesses and recognizes the value of a diverse supply chain. Suppliers should support diverse businesses (for example, minority-, women- and veteran-owned businesses in the United States) 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 and goals, including providing relevant reporting upon request.

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. Visa will never retaliate against anyone who raises a concern in good faith.

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.