



**VISA**

Code of Business  
Conduct and Ethics

**Integrity.  
Everyday.  
Everywhere.**

At Visa, we understand the importance of doing business the right way. It's a key part of how we make the world better, together. Our Code of Business Conduct and Ethics applies to everyone working with or on behalf of Visa, including employees, contingent staff and the Board of Directors. Our Code outlines our commitment to the highest levels of business ethics and integrity. We are all responsible for ethics and compliance. It's who we are. It's what we value. It's how we work.

Read the Code. Live it. Come back to it whenever you have a question or concern.





# Letter from Our CEO

Colleagues:

Our unwavering commitment to integrity is essential to ensuring that Visa remains a respected company that people want to do business with, and a place where our employees are inspired to do their best work.

As a global leader in digital payments, Visa facilitates transactions among consumers, merchants, financial institutions, and governments in more than 200 countries and territories. Visa's brand is built on trust. Our Code of Business Conduct and Ethics, along with our Leadership Principles, reflect the commitments and expectations we have for how we act and make decisions.

We value and encourage a transparent environment where people feel comfortable asking questions, respectfully disagreeing, and raising concerns. We hold each other accountable for doing what's right and challenge each other to do better, every day. This is the collective responsibility that we all share and ensures that we are all doing our part to protect Visa's outstanding reputation.

By always following our Code, we make it clear that being honest, fair and principled is our universal way of operating. Thank you for maintaining and supporting the strong ethical culture that makes Visa a trusted brand and a great place to work.

**Ryan McInerney**  
*Chief Executive Officer*  
Visa

# Our Leadership Principles



## Lead Courageously

Act like an owner

Think big and challenge the status quo

Hold ourselves and each other accountable

## Obsess about Customers

Listen and learn from customers

Dream, design, and build the future of payments

Sell with pride and purpose

## Collaborate as One Visa

Champion inclusion and diversity

Encourage constructive debate

Enable each other to succeed

## Execute with Excellence

Decide quickly and move fast

Deliver seamlessly

Learn from our mistakes

# Purpose and Mission

Our purpose is to uplift everyone, everywhere by being the best way to pay and be paid.

Our mission is to connect the world through the most innovative, convenient, reliable and secure payments network. We enable individuals, businesses and economies to thrive. We believe in economies that include everyone everywhere, uplift everyone everywhere and see access as foundational to the future of money movement.



# Code of Business Conduct and Ethics: Summary

Below are the major sections of our Code, with a brief description of each. Use this to both prepare and refresh yourself with regard to the key topics of our Code.

## 1. We Honor the Code

- How to handle ethical issues according to our Code

## 2. We Speak Up

- How we best step up and speak up to ensure the highest standards of integrity

## 3. We Foster a Culture of Respect

- How we treat each other as a team of unique individuals committed to excellence, workplace safety and employee privacy

## 4. We Safeguard Our Assets and Information

- How we keep our company strong by protecting key records, assets and information, without conflicts of interest

## 5. We Uphold the Law

- How we compete fairly, lawfully and ethically around the world, with all business partners and customers and throughout our supply chains

## 6. We Connect the World

- How we best represent Visa and give back to our communities



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# We Honor the Code

Visa is a world leader in digital payments. We facilitate transactions between consumers, merchants, financial institutions and government entities across more than 200 countries and territories.

We have changed the way people pay and are paid around the world because of one simple word—trust. People trust the security and reliability of VisaNet. Most important, they trust us to do what is right. Our success depends on maintaining that trust.

We do our part to earn trust by following the Code of Business Conduct and Ethics.





# We Use Good Judgment

## Using Our Code

Our Code reflects who we are as a company and our commitment to the highest ethical standards. Every action and decision we make at all levels defines who we are. Our Code applies to everyone working with or on behalf of Visa, including:

- Employees
- Contingent staff
- Board of Directors

If you are faced with a compliance concern or an ethical dilemma, the Code provides you with easy-to-understand information to guide your decisions. Seek help if you have questions or need guidance.

We always use good judgment to protect Visa's global reputation, and we seek help when we need guidance.



## Integrity. Everyday. Everywhere.

Q

What if a coworker asks you to do something you think may be unethical, against policy or unlawful? What should you do?

A

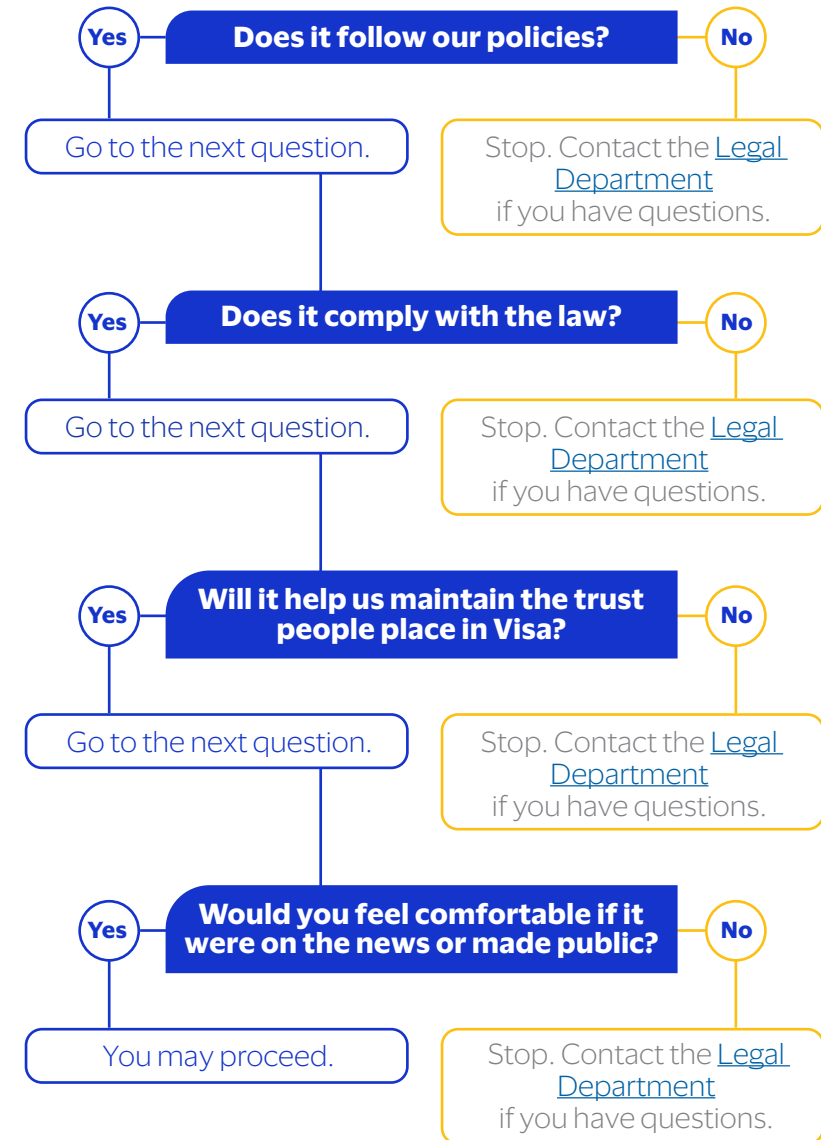
Contact your manager, senior management, the **Global Ethics and Compliance Team**, the **People Team**, the **Legal Department** or our **Confidential Ethics and Compliance Hotline**. One of these will help you review the situation.

### Remember

- Refer to the Code to make the right decisions
- Use good judgment to uphold the highest ethical standards and protect the brand
- Seek help if you have questions



If you are unsure of what choice to make, ask yourself . . .



# We Speak Up

At Visa, we understand that our reputation is earned. When we see something that threatens our reputation, we raise a concern. Be an upstander, not a bystander.



# Do Your Part—Speak Up

If you are asked to do something that makes you feel uncomfortable, or you see or suspect activity that goes against our Code, the law or our values, let someone know. Choose the reporting channel that feels right for you. Optional channels for raising a concern include:

- Your manager or upper-level manager
- The [People Team](#)
- The [Global Ethics and Compliance Team](#) or the [Business Conduct Office](#)
- The [Legal Department](#)
- Our [Confidential Ethics and Compliance Hotline](#), accessible 24/7 in multiple languages

## Cooperate

We cooperate fully in any misconduct investigation. Failing to cooperate or interfering with an investigation may result in disciplinary action, up to and including termination.

## No Retaliation

We never retaliate against anyone who participates in an investigation or raises a concern in good faith. Retaliation will result in disciplinary action, up to and including termination.



## What Happens After a Concern Is Raised?

Our goal is to ensure a safe and respectful environment where everyone can come and do their best work. When we learn of a potential violation of the Visa Code of Business Conduct and Ethics or other Visa policy by Visa staff, a confidential, professional investigation is conducted. We address misconduct through a formal resolution process. Confirmed violations of our Code and other company policy will result in corrective action.

## Communicating Outside Visa

Nothing in this Code or in any Visa policy prevents you from communicating directly with government agencies or law enforcement about violations of laws or regulations. You do not need the prior permission of Visa's [Legal Department](#) to engage in such communications, nor do you need to inform the company about such communications.

# Confidential Ethics and Compliance Hotline

Our [Confidential Ethics and Compliance Hotline](#) is operated by a third party and is accessible online or by phone, 24 hours a day, seven days a week. You may report anonymously, where permitted by local law. Keep in mind that anonymous reports are more difficult to investigate. Identifying yourself may expedite and ensure thorough review of your concern. We will address your concern or question promptly, and your identity will be kept confidential to the fullest extent possible.

For guidance on the Code of Business Conduct and Ethics or questions involving employee conduct, contact the [Business Conduct Office](#).



## How Do I Find the Correct Hotline Number in My Country?

You may contact our Hotline from any location by [going online](#). To reach the Hotline by phone, follow these steps:

1. Use the international toll-free dialing codes [web page](#)
2. Select the country from which you are calling
3. Dial the toll-free number
4. Dial the Hotline number: 1-888-289-9322 (see [guide](#) for the phone number in your country)



# Everyone's Responsibilities

We are all responsible for acting ethically and in compliance with the law. Here are just a few ways we demonstrate ethics in every situation:

- **We lead by example** by supporting our teams and modeling behavior they can follow.
- **We inspire others** to act with integrity and speak up with concerns.
- **We are always honest** in our business dealings internally and externally.
- **We comply with our Code**, company policies and all laws and regulations.
- **We seek guidance** from managers or other company resources when needed.
- **We report suspected violations** of the Code, Visa policies or the law.
- **We encourage open communication** and a Speak Up culture so we can raise concerns without fear of retaliation.



# Manager-Specific Responsibilities

Managers are role models. As such, their responsibilities include the following:

- **Keep an open door**—Encourage team members to come to you with questions and concerns. Be available and listen. Help team members make sound work decisions.
- **Escalate concerns**—Promptly report any behavior you suspect is unethical or illegal, violates our Code or policies, or goes against the way we do business. However, you should not investigate the concern yourself.
- **Do not tolerate retaliation**—Never retaliate against team members for sharing concerns or asking questions. Always take swift action to protect employees from retaliation by others.

Even those in leadership roles sometimes need help. If you are not sure of the proper course of action, seek guidance.



# We Foster a Culture of Respect

Promoting a culture of respect means treating each other well. This enables us to work better, together, and it establishes trust. Our commitment to respecting each other is also good for business.





# Inclusion

## How We Lead

We believe everyone deserves an equal chance. Uplifting everyone, everywhere is Visa's purpose and the foundation of our company culture. Our network connects the world, bringing equity and opportunity that improves lives. We work together to increase everyone's access to the global economy - regardless of who you are, what you know or where you live.

## How It Helps

We are all at our best when we value people based on how they want to be valued. An inclusive culture creates an environment in which individual differences, experiences and capabilities contribute to our business success.



## How We Act

We foster belonging in the workplace, support diversity of thought, experience and background, and actively work to enable everyone to thrive.

# Harassment and Discrimination

## How We Lead

We support all our employees, always. Any form of discrimination or harassment is prohibited.

## How It Helps

We value the individual differences, experiences and capabilities of each employee. This makes Visa a better place to work and a better business partner for our clients and merchants.

## Integrity. Everyday. Everywhere.

Q

*What if you see, suspect or experience harassment or discrimination?*

A

**You should report it to your manager or the People Team. You may also use the [Confidential Ethics and Compliance Hotline \(1-888-289-9322\)](#).**

Q

*What if your manager is the one discriminating against you? Where do you turn?*

A

**If you feel your manager is discriminating against or harassing you, seek help by reporting it to the [Business Conduct Office](#) or the [Confidential Ethics and Compliance Hotline](#). You may also contact the [People Team](#).**

## How We Act

We are strongly committed to equal opportunity in all employment decisions and promote a culture where everyone is treated with dignity and respect. We prohibit any form of harassment or discrimination based on protected class. Discrimination or harassment based on a protected class may occur in writing, verbally, physically, or visually, such as photos or videos. Protected classes include but are not limited to the following:

- Race or skin color
- Sex, sexual orientation and gender identity or expression
- Creed or religion
- Age
- Marital status
- National origin, ancestry or citizenship
- Pregnancy
- Medical condition
- Veteran status
- Physical or mental disability

# Respectful Conduct

## How We Lead

Conduct, including speech, that is disrespectful of Visa staff or others involved with Visa could lead to corrective action, up to and including termination.

## How It Helps

Respectful conduct shows that we care, and that we value everyone's contributions. When we support and respect our abilities and identities, we bring out the best in each other and our teams.

## How We Act

We conduct ourselves respectfully when we:

- Think carefully about our words and actions
- Never say or do anything others may find offensive
- Speak up when we see disrespectful behavior
- Always treat others with kindness and acceptance

Disrespectful behavior is not tolerated. Offensive, threatening, or degrading words or actions harm our teams.



# Workplace Security and Safety

## How We Lead

We are committed to providing a safe and secure working environment. Any threatening or violent behavior has no place at Visa. The security and safety of our employees is paramount.

## How It Helps

A respectful workplace is a safe workplace. First and foremost, we must keep our workplaces free of dangers of all kinds. We do our best work when we know we are secure.



## How We Act

We follow all safety protocols and procedures—this applies to both work processes and workplace security. Visa employees, consultants, contractors and guests—except for authorized personnel or law enforcement officials—are prohibited from bringing any kind of weapon into any Visa facilities. Contact Global Security and Safety immediately at 1-571-439-7111 or toll-free 1-855-544-VISA (8472). If you see someone with a weapon in a Visa facility, need to report a safety hazard, injury, or work-related illness.



## Alcohol and Drug Use

Alcohol and drug use impairs our ability to perform at our best, and it can place others at risk. We do not use, sell or possess drugs or alcohol at work, and we never work under their influence. Prescription and over-the-counter medicines are permitted if taken according to a doctor's instructions and you are able to safely perform your job.

Alcohol may be provided at some company events on Visa premises, with advance approval from a Site Lead, Country Manager, Regional President, or Executive Leadership Team member. At these events, we are still acting as representatives of Visa; use good judgment.

# Protecting Employee Privacy

## How We Lead

We respect the confidentiality of employee information. We never disclose this information inappropriately, and we follow all laws governing employee privacy.

## How It Helps

Trust is core to our business. That trust begins with each other. For business purposes, we may need to collect private information from our employees. To maintain the trust that makes our business thrive, we must handle this information according to our high ethical standards.

## How We Act

As with consumer and client information, we take measures to protect our employees' personal records and information:

- Only those with appropriate authorization may access employment records.
- We only collect and access records for legitimate business purposes.
- Outside of business operations, we never share employee information without explicit permission.

If you mistakenly receive the personal information of other Visa employees, contact the [Visa Security Incident Response Team](#) (VSIRT) immediately. Do not access or use the data.



# Freedom of Association

## How We Lead

Our people are our greatest asset. We recognize employees' right to freedom of association and collective bargaining.

## How It Helps

Workers have the right to organize to protect their own interests. When we act in accordance with labor laws, we ensure fair negotiations. We show respect for our teams so they can do their best work.

## How We Act

We follow all labor-relations laws, wherever we do business.



# Accessibility and Accommodations

## How We Lead

We are committed to accessibility for our customers and in our workplaces.

## How It Helps

To maintain an inclusive workplace for our employees, we provide workplaces that are accessible so we can all do our best work as a team. To foster financial inclusion for all our customers, accessibility is a key factor when developing products and services.

## How We Act

Everyone at Visa has a role to play in building, maintaining and supporting accessibility for our colleagues and customers. We consider accessibility a key factor in knocking down barriers to achievement in our workplaces. When requested, we provide reasonable accommodations to employees with disabilities, and we work with vendors to improve the accessibility of our internal tools.

If you require an accommodation due to a disability, contact [Workplace Accommodations](#) or email [accommodations@visa.com](mailto:accommodations@visa.com). If you have a question about procuring products with third parties or want to learn more about building accessible products, consult with Visa's [Accessibility Team](#).



### Find Out More

- [Integrity and Respect at Work Insite Page](#)
- [Harassment and Discrimination Policy](#)
- [Ask People Team](#)
- [Employee Handbooks](#)
- [Working with Employee Relations](#)



# We Avoid Conflicts of Interest

## How We Lead

We are transparent in our business dealings. By avoiding conflicts of interest and disclosing potential areas of conflict, we demonstrate our commitment to and support of Visa's strong ethical culture. We never put our personal interests in conflict with those of Visa. We all play a role in protecting our company. The power of our brand depends on our reputation.

## How It Helps

As Visa employees, we share a common interest in protecting our company. We are transparent in our business dealings and avoid situations that put our personal interests in conflict with those of Visa or lead others to question our business or professional objectivity. If you become aware of a potential conflict, you have an obligation to disclose it.

## How We Act

We follow our [Conflict of Interest Policy](#) and disclose potential conflicts to enable the company to assess any risk and put in place mitigation if necessary. If you have any additional questions or concerns regarding your conflict of interest disclosure obligations, either under the [Conflict of Interest Policy](#) or [External Board, Advisory or Equivalent Roles Policy](#), please contact the [Business Conduct Office](#).

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## We Avoid Conflicts of Interest (continued)

It is impossible to outline all potential conflicts of interest, so we must use good judgment in our day-to-day activities. The following are areas where conflicts of interest often arise:

- **Outside employment**, including self-employment, consulting activities even if they are not in the payments space, or involvement in any start-up ventures or engaging Visa staff in such a venture
- **Advisory board, Board of Directors or equivalent fiduciary roles** for a residential, charitable, not-for-profit, religious, or social organization, or as part of your official Visa job duties, or you wish to serve on a Board for any entity owned or controlled by you or your family
- **Unpaid professional activities** for any payment service or related entity that has a relationship with Visa
- **Close relative** who works at Visa, in a Payment Service Company or for any organization that has a relationship or competes with Visa. Visa recognizes that there will be times when the employment of relatives may occur in the workplace. Such relationships may result in conflicts of interest, potential bias or favoritism or adversely affect the ability of Visa to operate effectively.
- **Previous employment** with a Visa business partner, and you are now involved in decisions regarding that organization
- **Financial interest or investment** (as owner, partner or stockholder) of 1% or greater of the total outstanding shares of any publicly traded company
- **Financial interest or investment** (either directly or through an investment/venture fund where you have influence over investment decisions) in a private company/startup in a payment service or related entity that has a relationship with Visa
- **Relationships with government officials** or offices that have influence over matters that could affect Visa business
- **Prior government employment**



### Commercial Boards

Additional requirements exist for serving on an advisory board, Board of Directors or equivalent role for organization types not covered under the [Conflict of Interest Policy](#) (e.g., most for-profit entities). For these situations, employees at a job level of SVP or higher may seek such roles if certain eligibility and approval requirements are met. These are stated in the [External Board, Advisory or Equivalent Roles Policy](#). Commercial board service by VPs and below is not allowed unless an exception is granted by the CEO and EVP, General Counsel of Visa.

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## We Avoid Conflicts of Interest (continued)



### Close Personal Relationships

We recognize that employees may become involved in a close personal relationship. A disclosure to the Conflict of Interest Program is required when a Visa employee begins dating and/or is involved in a romantic or sexual relationship with anyone who works for Visa. A disclosure is also required when a Visa employee is in a close personal relationship with an individual who works for any entity that has a relationship with Visa and the employee participates in Visa business activities involving that entity. Disclosure of the relationship is required even if the employees are peers, work in different functional roles or work in different locations.

You may also contact the mailbox for the Conflict of Interest Program. This is a confidential process. It helps Visa assess any organizational impact from the relationship.

Under no circumstances may an employee in a management position engage in a close personal relationship with an employee in the same reporting line. This also applies to any worker whose terms or conditions of employment may be influenced by that manager.

### Find Out More

- [Conflict of Interest Policy](#)
- [External Board, Advisory or Equivalent Roles Policy](#)
- [Conflict of Interest Disclosure Form](#)

# We Safeguard Our Assets and Information

Our customers trust us to keep them protected. To maintain that trust, we must safeguard our physical assets, intellectual property and confidential information. We must also keep accurate financial records. The continued success of our global payment systems depends on it.



# We Protect Our Assets

## How We Lead

Our assets are the tools and information we use to do our work each day. They allow us to operate effectively as a company and help us continue to be successful.

## How It Helps

Through hard work, we have built up key business assets over the course of our history. Without these assets, we cannot serve our customers and business partners. These assets are also essential to our strategic vision for the future. We are all responsible for our assets, which come in many forms:

- Physical assets: furniture, funds, supplies and facilities
- Electronic assets: our technology resources, including hardware, software, mobile devices and tablets

## How We Act

We protect our assets when we:

- Ensure that assets are not damaged, lost or stolen
- Report immediately when assets are defective or in need of repair
- Use all assets appropriately and with good judgment
- Follow all procedures to keep assets secure, both in the office and while traveling
- Never allow unauthorized individuals to use our assets



## A Note on Personal Use

Occasional personal use of Visa technology assets, such as email or browsing the web, is generally permitted. Please use good judgment, and never access unauthorized websites (e.g., gambling or adult content). Understand that anything sent, received or downloaded on our systems is company property, in accordance with applicable law. We may also review the contents of our systems at any time, where permitted by law. Be careful in how you use our electronic assets. Never use them to engage in illegal activity, activity that violates our policies or anything that would negatively affect our company or its reputation.



# Protecting Our Information Systems

## How We Lead

As a global payments technology company, our information and technology assets are valuable. We must safeguard them from malware, data breaches and other risks.

## How It Helps

Information drives our business, and our information systems allow us to connect people globally. We use our information systems to process data that is both sensitive and valuable. Protecting that data means protecting the systems that store, process, or transmit it.

## How We Act

To protect our information systems, we:

- Always use our Visa email address when conducting business
- Always handle Visa information according to our Information Classifications
- Never install unapproved software or hardware
- Never use unauthorized devices on our network
- Never access unauthorized websites
- Never share passwords or access codes
- Never open suspicious or unsolicited email
- Never forward, share or upload Visa Confidential or higher-classified information using personal messaging apps, social media or other online accounts such as personal email



# Confidential Business Information and Intellectual Property

## How We Lead

Our confidential and proprietary business information is key to our success as a company. We always take appropriate measures to preserve such information.

## How It Helps

Our innovations connect millions of people, every day. To connect people and possibilities, and to further our business, we must continue to innovate. Protecting our confidential and proprietary information is central to that process.



## How We Act

To protect our confidential business information, we:

- Never leave confidential information where others can see or access it
- Access and store such information only on approved devices
- Never discuss confidential matters in public
- Ensure confidential information is always secure, even at your office desk
- Dispose of all confidential information according to company policy
- Always get permission from the [Legal Department](#) before sharing confidential information

Your responsibility to protect our confidential business information does not end when you leave our company. You are still legally obligated to protect confidential information. Do not share it with any current, former or future employers. We depend on you to do what is right and take appropriate measures to preserve our confidential business information.

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### What Is Confidential Information?

While working at Visa, you may have access to confidential business information. This information provides Visa with a competitive advantage and could cause harm if made public. We all have a responsibility to protect confidential information from unauthorized access and disclosure. Some examples of confidential business information include:

- Cardholder/Payment account information or financial records
- Unpublished data and reports
- Business, marketing and service plans
- Intellectual property

### Visa Information Classifications

Learn more about the [Visa Information Classifications](#):

- Visa Public
- Visa Confidential
- Visa Restricted
- Visa Restricted—Personal Information

Depending on the classification, additional safeguards may be required. We avoid business harm and legal exposure when we handle information with care and in accordance with Visa's Key Controls Policy.

### What Is Intellectual Property (IP)?

The innovative ideas we develop in our work, such as patents, trademarks and the Visa brand, are all forms of IP. To protect our IP, never disclose it to a third party without approval. Also, remember that anything you create, design or develop within the scope of your work for Visa is the sole property of our company.

We must also respect the IP rights of others. We take care not to infringe patents, trademarks or other rights. IP is a critical component of our business and the business of others. We respect others' IP just as we expect them to respect ours.

### Protecting Our Assets

Some Visa employees may have access to sensitive information, including non-public cardholder and payment account information. This information, along with our information systems and IP, can be especially vulnerable. Help us protect our intangible assets. If you know or suspect that any of our assets have been lost or stolen, report it immediately to [Global Security and Safety](#) and complete the [Report a lost or stolen wireless device Ask Now form](#). [Global Security and Safety](#) will promptly investigate the matter and take appropriate action.



### Remember

- Protect our assets from loss, waste and misuse
- Do not infringe on others' IP rights
- Take measures to prevent unauthorized access to our systems
- Keep confidential business information secure

### Find Out More

- [Visa Information Classifications](#)
- [Key Controls](#)
- [Records and Information Management Policy](#)





# Accuracy in Recordkeeping

## How We Lead

We maintain accurate records that appropriately support business transactions in our financial statements. By following our internal controls, finance policies and procedures and recordkeeping policies, we achieve this goal. Even internal business records and communications may become public. This is why we must always avoid exaggerated information, inappropriate language and guesswork in our recordkeeping.

## How It Helps

Accurate financial records are essential to making sound business decisions and complying with the law. We must maintain the trust that investors, customers and business partners place in us. Even internal records may become public, so we never exaggerate or guess when it comes to recordkeeping.



## How We Act

To ensure accurate recordkeeping, we:

- Always keep detailed books, records and accounting statements
- Comply with generally accepted accounting principles, laws and regulations
- Follow all internal controls and policies
- Accurately record all our transactions, without exaggeration
- Submit all records to internal and external auditors promptly
- Report any records that appear false or misleading

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## Expense Reports

Many Visa employees regularly use company-issued corporate cards or purchasing cards (P-Cards) to charge business expenses such as travel. When using these cards, make sure you record and document expenses timely and accurately. Seek help from your manager or [Controllershship](#) if you are unsure if an expense is permissible. We only use company-issued cards for reasonable, bona fide and lawful business expenditures in accordance with Company policy and guidelines. Personal expenditures are not allowed. Inadvertent and incidental personal expenses incurred on corporate cards or purchasing cards must be reported and reimbursed to Visa.



### Questionable Accounting Matters

Each of us is responsible for detecting and reporting potential or actual fraud. Any activity that you believe reasonably constitutes potential or actual fraud should be reported immediately. Fraudulent activity may include any of the following:

- Forgery
- Extortion
- Theft
- Misappropriation of assets
- Misrepresenting our company's financial condition
- Embezzlement
- Omissions of material information
- Errors in the audit or evaluation of financial statements or in maintaining financial records
- Noncompliance with our internal accounting policies or controls

To the extent possible under law, we protect those who report concerns regarding questionable accounting matters and violations of securities laws. If you have a question or concern regarding questionable accounting matters, contact one of the following:

- [Global Ethics and Compliance Team](#) or [Legal Department](#)
- [Business Conduct Office](#)
- [Confidential Ethics and Compliance Hotline](#)
- [Corporate Controller](#)
- [Visa Whistleblower Policy](#)

## Integrity. Everyday. Everywhere.

Q

*A coworker asked you to change some information on an invoice, but you never received any documentation to support the changes. Should you make the changes?*

A

**No. You are required to record transactions ethically and honestly. You should ask the coworker to provide the supporting documentation. If they do not provide it, contact your manager, the [Corporate Controller](#) or our [Hotline](#) for help.**



## Code of Ethics for Certain Executive and Financial Officers

The Code of Ethics for Certain Executive and Financial Officers outlines additional requirements. These apply to the Chief Executive Officer (CEO), Corporate Secretary, General Counsel and certain financial officers (including the Chief Financial Officer, Chief Accounting Officer and [Corporate Controller](#)).

These officers shall promptly notify the General Counsel of any of the issues listed below. The General Counsel will then review, as appropriate, with the CEO, Disclosure Committee, Audit and Risk Committee or Board of Directors the following:

- Any material information that could affect our public filing disclosures
- Any significant deficiencies or material weaknesses in the design or operation of internal controls that could adversely affect our ability to record, process, summarize and report financial data
- Any fraud that involves management or other staff who have a significant role in our financial reporting, disclosures or internal controls
- Any material violation of our Code of Business Conduct and Ethics or other securities laws by the company, management or staff
- Any actual or apparent conflict of interest of any material transaction or relationship with the company
- Any information related to the independence of our external auditors

# Records and Information Management

## How We Lead

We handle our records and information with care. The integrity of our recordkeeping is core to our business.

## How It Helps

We optimize performance and reduce risk when we maintain records according to the law and our policies. We generate records in the course of our business, and some must be retained for specific periods of time.

## How We Act

To manage records effectively, we:

- Keep and dispose of information according to our policies and internal controls
- Record financial transactions accurately
- Ensure records are easy to access, organized and secure
- Report any suspected fraud or misrepresentation in our records
- Keep any records subject to a hold from the [Legal Department](#)
- Provide any records requested in connection with an audit or investigation
- Ensure that our accounting matters include travel and expenses, accounting, internal accounting controls and SOX auditing matters



## Find Out More

- [Records and Information Management Policy](#)
- [Information Security Policy](#)
- [Data Center Tour Policy](#)
- [Global Wireless Device Policy](#)
- [Information Technology Asset Management Policy](#)
- [Intellectual Property Policy](#)
- [Records and Information Management Policy](#)
- [Travel and Expense and Purchasing Card Program Policy](#)
- [Global Card Program Guidelines](#)



# We Uphold the Law

There is a difference between the spirit of the law and the letter of the law. At Visa, we strive to uphold both. We are committed to complying with applicable laws in every decision we make, and in every action we take. This is how we lead by example.



# We Uphold the Highest Standards for Government Work

## How We Lead

Visa is honored to work with governments around the world. We recognize that this comes with great responsibility to meet and exceed the highest ethical standards.

## How It Helps

We enable connecting businesses, banks and governments in more than 200 countries and territories worldwide. With such a global presence, we must respect the laws and governments where we operate. Because we appreciate that government work contributes to our business, we approach it with extra diligence.

## How We Act

When engaging with government, we always:

- Follow all rules surrounding the procurement process for government contracts
- Follow all legal and local government requirements that apply to our work (contact [Government Engagement](#) or the [Legal Department](#) with questions)
- Follow all policies related to gifts and entertainment, anti-bribery and anti-corruption
- Are mindful, in the United States, of local “pay-to-play” laws that can impact our personal political contributions (email [PayToPlay@visa.com](mailto:PayToPlay@visa.com) with questions)
- Are open, honest and transparent

Public sector decisions can significantly impact Visa’s business and industry as well as the communities in which we operate.



# We Respect the Political Process

## How We Lead

We support constructive engagement in the political process. As a company, we engage ethically with all governments where we do business.

## How It Helps

Participating in politics and civic engagement activities is part of how we make the world a better place. As individuals, we have a right to our political views, but we never use time or resources on the job for our personal politics. We protect Visa's reputation by separating our personal politics from the company.

## Political Contributions

Visa uses corporate funds to contribute to state or local candidates. We also do so in a few countries outside the United States, in full accordance with the law. Remember that only [Government Engagement](#) may make such contributions using company funds.

## Find Out More

- [Political Participation, Lobbying and Contributions Policy](#)



## How We Act

When participating in politics outside of work, we:

- Always keep our personal views separate from those of Visa
- Never use company time or resources for political activities
- Seek pre-approval from [Government Engagement](#) and our Executive Committee member if we want to run for or accept appointment to office, accept employment in a government office or participate in any lobbying activity on behalf of Visa

When participating in politics as a company, we:

- Follow all rules for contributing to political candidates and parties
- Only make political contributions through [Government Engagement](#)
- Always get approval from [Government Engagement](#) before participating in discussions with government officials on behalf of Visa
- Follow all Visa policies that involve working with government, including antitrust and competition, anti-bribery and corruption and gifts and entertainment
- Follow all government contractual requirements

Remember, your views and actions when engaging in political affairs are your own and not those of Visa.

# We Adhere to Anti-Money Laundering, Anti-Terrorist Financing and Sanctions Laws

## How We Lead

We follow all requirements related to sanctioned governments. Our business and our reputation depend on us working with ethical partners.

## How It Helps

We decide to do business with various partners based on our commitment to following the law and protecting our payment system and reputation.

## How We Act

We adhere to all anti-money laundering, anti-terrorist and sanctions laws when we:

- Follow all controls, policies and protocols in place regarding these laws
- Notify the AML and Sanctions Compliance Office with any concerns or questions, or if we notice suspicious activity
- Conduct risk-based due diligence on clients that access our payment systems
- Conduct business with reputable partners
- Follow all requirements related to sanctioned governments, entities and individuals

*(continued on next page)*

## Complying with the Law

Visa complies with all anti-money laundering, counter-terrorism financing and sanctions laws. When asked, we must assist the AML and Sanctions Compliance Office in carrying out the controls we use to follow these laws. Failure to do so may result in harm to Visa's reputation as well as financial losses.







## Money Laundering, Terrorist Financing and Sanctions

Money laundering is the process of hiding the proceeds of crime or making the source appear legitimate. Terrorist financing is the solicitation, collection or provision of funds from both legal and illicit sources to support terrorist acts or organizations.

Sanctions restrict Visa's business dealings with specific governments and jurisdictions. They also restrict dealings with individuals and entities designated under programs related to terrorists and international criminal organizations, weapons of mass destruction, narcotics trafficking and more.

### Find Out More

- [Anti-Money Laundering and Anti-Terrorist Financing \(AML/ATF\) and Sanctions and Export Controls](#)

# We Do Not Tolerate Bribery and Corruption

## How We Lead

We believe that the right way to do business is the only way to do business. We never offer or accept anything improper to secure business.

## How It Helps

We win business by competing fairly. We never offer or accept anything of value to influence a business decision. The consequences for giving or accepting a bribe can be severe for Visa and you as an individual.

## How We Act

We follow anti-corruption laws in all places we do business, around the world. To avoid bribery and corruption, we:

- Never offer or accept anything of value to influence a business decision
- Follow all policies on gifts and entertainment
- Take extra care when interacting with public officials
- Know limits on gifts and things of value in all places we do business
- Contact the [Global Ethics and Compliance Team](#) or [Legal Department](#) with any doubts or concerns
- Follow all policies in vetting third parties working on our behalf
- Keep accurate, detailed records



## Public Officials and Third Parties

Use extra care when interacting with public officials. This includes employees of state-owned enterprises. Many countries, states and local jurisdictions have limits on what gifts and other things of value can be offered to these parties. Know these limits, wherever you operate. What may be legal in one jurisdiction may be illegal in another. Visa is subject to the U.S. Foreign Corrupt Practices Act (FCPA), as well as applicable anti-corruption laws of other countries in which we operate. If you are ever in doubt, contact the [Global Ethics and Compliance Team](#) or [Legal Department](#).

Remember that this also applies to third parties. Third parties cannot be used to make offers that Visa cannot lawfully make itself. Never offer something of value to a third party if you think it may be passed along to a public official in a pending business deal. Follow our procurement procedures to vet the use of third parties. If you suspect a third party is misusing Visa funds (or any funds), report it to the Global Ethics and Compliance Team.

## Enforcement

Consequences for violating anti-bribery laws are increasingly harsh. This is as true for individuals as it is for corporations. Criminal and civil enforcement actions are on the rise. These often carry harsh sentences and large fines.

## Find Out More

- [Anti-Bribery Policy](#)

# We Comply with Gifting and Entertainment Rules

## How We Lead

We look for ways to strengthen our business relationships. A small gift can do just that. However, we never give or receive gifts or entertainment to influence a business partner, nor do we allow gifts or entertainment to impact our ability to make objective decisions on Visa's behalf.

## How It Helps

Our success is based on the value we create. Our reputation and continued success rely on making impartial business decisions. In many cases, small gifts and entertainment do not affect business judgment. They can even create goodwill between business partners. In some cases, though, they can violate the law. We never allow even the appearance of improper influence.

## Find Out More

- [Travel and Expense and Purchasing Card Program Policy](#)
- [CardProgramAdmin@visa.com](mailto:CardProgramAdmin@visa.com)—US and Canada
- [APCardProgramAdmin@visa.com](mailto:APCardProgramAdmin@visa.com)—APAC
- [CEMEACardProgramAdmin@visa.com](mailto:CEMECARDProgramAdmin@visa.com)—CEMEA
- [EUExpensesDept@visa.com](mailto:EUExpensesDept@visa.com)—Europe
- [LACCardProgramAdmin@visa.com](mailto:LACCardProgramAdmin@visa.com)—LAC



## How We Act

We comply with rules on gifts and entertainment when we:

- Never allow gifts or entertainment to affect our business decisions
- Never accept gifts or entertainment that might appear to affect our business decisions
- Never ask for gifts
- Never accept cash. Gift cards may be accepted with approval from your local Ethics and Compliance team.
- Never seek personal gain through our position at Visa

We may at times give gifts or offer entertainment. Such offers must be:

- For a proper business purpose only
- Documented in compliance with local laws
- In accordance with company policy
- Not cash or cash equivalent (such as a gift card) unless approved by your local Ethics and Compliance team.

At times you may not be sure whether to accept a gift. In such cases, seek help from:

- Your manager
- Your local [Controllership](#)
- Your regional card program administrator (for [Travel and Expense and Purchasing Card Program Policy](#) and [Guidelines](#))
- The [Global Ethics and Compliance Team](#)

# We Do Not Engage in Insider Trading

## How We Lead

We never share non-public information for the purpose of buying or selling securities, nor do we use such information to tip others or hedge, pledge, or short sell our own stock. Insider trading is not just unethical; it is illegal.

## How It Helps

In the course of our jobs, we may have access to material, nonpublic information about Visa. We may learn such information about our clients, vendors or partners. We never share this. Our reputation as a trustworthy company relies on it.

## How We Act

We prevent insider trading when we:

- Never buy or sell Visa shares, or shares in any publicly traded company, when we have inside information
- Never share inside information outside the company
- Only share inside information within the company on a “need-to-know” basis
- Never “tip,” or pass along inside information to someone who may act on it
- Never hedge, pledge or short-sell

*(continued on next page)*



## Material, Nonpublic Information

Some company information may be considered “material.” This is when an investor would likely find the information useful in deciding to trade in a company’s public securities. This type of information may also be called “inside information.” People who have access to this type of information are often called “insiders.” Examples of material, nonpublic information may include:

- Mergers or acquisitions
- Expected or actual financial performance
- Significant changes in executive management
- New products or services
- Cybersecurity breaches

“Insider trading” is when someone buys or sells stock while having inside information. This is illegal. Doing so could lead to serious penalties. We must avoid even the appearance of an improper transaction.

### Find Out More

- [Prevention of Insider Trading Policy](#)



## Integrity. Everyday. Everywhere.

**Q** *Say you are talking with one of Visa’s vendors. You learn about a big acquisition that they are about to make. It is not public yet, but you think it will cause the vendor’s stock to go up. Can you share this information with your sister-in-law?*

**A** **No. This is likely to be inside information. Sharing it would be considered a “tip.” It could influence her decision to buy stock, which is illegal. Both of you could face criminal penalties.**

# We Compete Fairly

## How We Lead

We compete fairly because we want to win on the merits of our products and services, not unfair business practices.

## How It Helps

Strong competition is good for business. It makes us better at what we do, and it strengthens our partnerships. We follow all laws that protect competition in all places we do business. Our work means more and has more impact in a fair marketplace.

## How We Act

To ensure fair competition, we:

- Use public sources to research competitors
- Never use proprietary information without authorization
- Never gain information through improper means (e.g., through a client or contractor)
- Never set prices or divide territories, markets or clients with competitors
- Never work with a competitor to restrict sales or alter a competitive bidding process
- Never restrict clients or suppliers in ways that affect their ability to compete
- Never forward or distribute competitive information we receive to others



## Gathering Competitive Information

At times, we need to gather information about our competitors. We must always do so legally and ethically. Use public sources. Use good judgment. Avoid even the appearance of anything inappropriate. You may receive information that you believe is confidential or obtained unethically. If so, speak up and contact the [Legal Department](#). Do not share the information with others.

## Antitrust and Competition Law

Antitrust and competition laws prohibit certain types of agreements and practices that restrict competition. These laws are complex and may differ from country to country. Make sure you know the laws that apply to your work. Any time you have questions about any of these laws in the course of your work, seek help from the [Legal Department](#). Someone may raise topics with you that you think are anti-competitive. If this happens, stop the conversation and report this exchange to the [Legal Department](#).

## Find Out More

- [Antitrust and Competition Law Compliance Policy](#)

# We Respect Data Privacy

## How We Lead

Visa operates one of the world's largest payment networks, and respecting privacy is central to our purpose. Visa has a Global Privacy Program to ensure proper safeguards be applied to personal information we collect, use and share. Our Privacy Program is centered on key privacy principles that allow the Privacy Program to adapt alongside Visa's global footprint, taking into account industry benchmarks and best practices in addition to evolving laws and regulations.

## How It Helps

Our focus is simple: to use the data entrusted to us in a responsible manner to benefit consumers and help businesses and economies grow. We embed these and other practices through a robust privacy program that allows us to measure and monitor organizational practices. We strive to be transparent about our data practices.

Even when you don't have access to personal information, all of us at Visa make decisions relating to personal information. Follow all relevant policies and laws, and reach out to the Global Privacy Office if you need guidance.

## How We Act

We respect data privacy when we:

- Collect, use, store and share personal information in accordance with the Global Privacy Policy (and any related standards, guidance, procedures and playbooks), as well as regulations and laws
- Contact the [Global Privacy Office](#) with any questions or concerns about data privacy
- Follow all [Key Controls](#) to maintain security and send any concerns of privacy incidents to [VSIRT@visa.com](mailto:VSIRT@visa.com).



### What Is Data Privacy?

Data privacy relates to the way we safeguard "personal information." (This can also be called "personal data.") Such data can be used (alone or when used in combination with other information) to identify an individual, whether or not an individual's name is associated with the information. We comply with data privacy laws to provide transparency relating to our data practices, prevent harm, protect an individual's rights, and maintain trust in the organization.

### Find Out More

- [Global Privacy Policy](#)
- [Global Privacy Office Insite Page](#)
- [Global Privacy Notice](#)
- [Key Controls](#)

# We Comply with Local Laws

## How We Lead

We are a global company. As such, we follow the laws wherever we do business. This includes special laws regarding tax evasion.

## How It Helps

Laws vary by country. Our business seeks to serve everyone, everywhere. This means we must know how laws affect our business by country. For example, the European Economic Area (EEA) and UK require separate scheme and processing activities. We follow this requirement, just as we follow the laws in all countries where we operate.

## How We Act

To ensure that we comply with local laws, we:

- Conduct due diligence checks on all third-party business partners
- Never recruit or market in a country before knowing local law
- Never assist in tax evasion
- Maintain separate scheme and processing activities, and never share sensitive information between Scheme and Processing teams



## Separation of Scheme and Processing

The [Interchange Fee Regulation \(IFR\)](#) is in effect in the EEA and UK. The IFR affects our business. It means our European and UK operations must maintain separate scheme and processing activities. It also means that Scheme and Processing teams may not share sensitive information.

We have taken steps to comply with the IFR. Relevant processing activities in Europe are carried out by Visa Technology and Operations. Scheme-related activities are undertaken by Visa Europe Limited.

The rest of Visa Inc. must also follow certain guidelines as a result. If you work with Visa in Europe, be sure to follow the [Separation of Scheme and Processing Code of Conduct](#). For more information on separation of scheme and processing, please contact [SeparationCompliance@visa.com](mailto:SeparationCompliance@visa.com).

*(continued on next page)*





## Anti-Tax Evasion Facilitation

Tax evasion is against the law, as is assisting or facilitating the tax evasion of others. Visa may be held criminally liable if any of its employees facilitate tax evasion.

We do not tolerate tax evasion in any form. We must all ensure that activities and processes are never used to assist in tax evasion. The [Anti-Tax Evasion Facilitation Standard](#) is a key resource to aid us in our efforts. For more, visit the [Anti-Tax Evasion Facilitation Resources Page](#).

If you have any questions or concerns, please share them. Reach out to your line manager, your Regional Compliance Officer, the [Legal Department](#) or [CFAcompliance@visa.com](mailto:CFAcompliance@visa.com).

### Find Out More

- [Interchange Fee Regulation \(IFR\)](#)
- [Separation of Scheme and Processing Code of Conduct](#)
- [Anti-Tax Evasion Insite Page](#)

### Raise a Concern

- [SeparationCompliance@visa.com](mailto:SeparationCompliance@visa.com)
- [CFAcompliance@visa.com](mailto:CFAcompliance@visa.com)

# Modern Slavery

## How We Lead

Visa is committed to complying with all applicable Modern Slavery laws and maintaining policies that support ethical trading principles.

## How It Helps

There are modern slavery risks in all sectors and industries. At Visa, our exposure to modern slavery risk may come from our global business operations or our supply chain.

We have published our [Visa Modern Slavery Act Transparency Statement](#).

## How We Act

We act with integrity in our business relationships and leverage existing systems and controls to identify and mitigate modern slavery and human trafficking risks in our supply chains and in our business. Slavery can be covert, so it may be difficult to easily uncover practices that support forced labor. Be vigilant when engaging with third parties and if you have a concern, contact the [Global Ethics and Compliance Team](#) or [Legal Department](#) for guidance.



# We Connect the World

Visa is the world's leading payments technology company. We connect the world. Our innovative, reliable and secure payment network leads the way. Through it, we help people, businesses and economies to thrive.



# We Speak on Behalf of Visa Only if Authorized

## How We Lead

We are all stewards of the Visa brand. We always strive to protect our brand and reputation.

## How It Helps

Everything we say on behalf of Visa affects our reputation. We must always speak positively and accurately. Our communities deserve clear communication from one voice. This is why we ensure those who are authorized speak publicly on behalf of the company.

## How We Act

We best represent Visa when we:

- Always follow Visa's [Key Controls Policy](#) and get approval to speak on behalf of Visa
- Refer media and external industry inquiries or requests for statements to the [Corporate Communications](#) team
- Protect our confidential business information
- Are respectful on social media
- Never disclose anything that could violate employee, client or business privacy
- Get approval to use outside social media to conduct business
- Always distinguish our views from those of the company

## Integrity. Everyday. Everywhere.

Q

*What can you share about your job and work life on social media?*

A

**We use our best judgment when posting online about Visa. Always protect our confidential business information, and follow our [Key Controls Policy](#). You are responsible for what you publish, and you may not speak on behalf of Visa without prior approval.**

**Most of us use social media in some form. We must be cautious about what we share. We always follow [Visa's Social Media Policy](#). Social media use by Visa staff, for any purpose, is subject to all relevant Visa policies. Social media should never be used in a way that violates any legal or ethical obligation. We do not tolerate:**

- **Discriminatory remarks**
- **Harassment**
- **Threats of violence**
- **Other inappropriate or unlawful conduct**

**These may result in disciplinary action.**

*(continued on next page)*



## Media and Press Inquiries

A member of the media may reach out to you with an inquiry. Or someone from a research or investment firm may ask you for a statement on a topic. Please refer these requests to the [Corporate Communications](#) team.

Remember, you may not speak on Visa's behalf without prior approval. If you believe you have a need to speak publicly at an event, you must submit a request using the [Speaking Authorization Form](#). You must also follow Visa's [Public Communications and Advertising Governance Policy](#).

## Find Out More

- [Public Communications and Advertising Governance Policy](#)
- [Social Media Policy](#)
- [Key Controls Policy](#)

# We Give Back Responsibly

## How We Lead

Giving back is part of how we do business. It enables individuals, businesses and economies to thrive. We strive to make a positive impact with the highest ethical standards.

## How It Helps

We believe that economies that include everyone, everywhere, uplift everyone, everywhere. Giving back is how we live our beliefs. It also builds trust in our brand, which can in turn drive business.

## How We Act

We give back responsibly when we:

- Contribute to causes that we care about
- Never allow charitable work to create a conflict or harm our company
- Get approval from [Inclusive Impact & Sustainability](#) before giving or acting on Visa's behalf
- Keep our manager and coworkers aware of our volunteer schedule



## Corporate Charitable Giving

Our corporate giving focuses on small and micro businesses. We want them to thrive. Our main focus is on these issues:

- Economic advancement globally
- Advancing financial education and inclusion
- Strengthening our local communities by amplifying employees' efforts to give back
- Responding to disasters and supporting key community needs

Our charitable efforts are guided by the [Charitable Contributions Policy](#). This ensures that our donations are aligned with Visa's strategic, business, and philanthropic goals as well as relevant law.

If you wish to donate to a charitable organization on Visa's behalf, you must get approval in advance from [Inclusive Impact & Sustainability](#). The same holds if Visa plans to endorse or publicize a charity. Check our [Charitable Contributions Companion Procedures](#) for more information.

*(continued on next page)*



## Employee Charitable and Volunteer Activities

We all take part in Visa's mission and purpose through the work we do every day. We encourage you to give to causes that you care about, and we offer many programs to help you in your efforts. Visit the [Giving Back Insite Page](#) to learn more about matching gifts, volunteer rewards, Volunteer Time Off (VTO) and other programs.

### Find Out More

- [Charitable Contributions Policy](#)
- [Charitable Contributions Companion Procedures](#)
- [Giving Back Insite Page](#)

# Resources

It is up to all of us to do the right thing. We are not in this alone, and we have resources to help uphold the Code.





# Have a Question or Concern?

Before you act—ask. Seek help if you are unsure about what to do in any situation. Use the resources below to find answers to your questions. Raise concerns if you see or suspect any activity that violates our Code.

Contact	Issue or Concern	Contact Information
Confidential Ethics and Compliance Hotline	Any issue, question or concern	<p><b>Phone:</b> 1-888-289-9322</p> <p><b>Web:</b> <a href="https://secure.ethicspoint.com/domain/media/en/gui/39166/index.html">https://secure.ethicspoint.com/domain/media/en/gui/39166/index.html</a></p>
Global Ethics and Compliance Team	<p>Any Code-related issue, question or concern</p> <p>Regions:</p> <p>AP CEMEA NA LAC Europe</p>	<p><b>Online (internal):</b> <a href="https://insite.trusted.visa.com/content/insite/functions/legal/compliance.html">https://insite.trusted.visa.com/content/insite/functions/legal/compliance.html</a></p> <p><b>Email:</b> <a href="mailto:APCompliance@visa.com">APCompliance@visa.com</a>  <a href="mailto:CEMEACO@visa.com">CEMEACO@visa.com</a>  <a href="mailto:NACompliance@visa.com">NACompliance@visa.com</a>  <a href="mailto:complac@visa.com">complac@visa.com</a>  <a href="mailto:EUCompliance@visa.com">EUCompliance@visa.com</a></p>

Have a Question or Concern? (continued)

Contact	Issue or Concern	Contact Information
Business Conduct Office	Any Code-related issue, question or concern	<p><b>Email:</b> <a href="mailto:Businessconduct@visa.com">Businessconduct@visa.com</a></p> <p><b>Online:</b> <a href="https://insite.trusted.visa.com/content/insite/functions/legal/compliance/business-conduct-office.html">https://insite.trusted.visa.com/content/insite/functions/legal/compliance/business-conduct-office.html</a></p> <p><b>Address:</b> Visa Inc., Business Conduct Office, 900 Metro Center Blvd., Foster City, CA 94404</p>
Conflict of Interest Program	Any disclosure, issue, question or concern related to conflicts of interest	<p><b>Email:</b> <a href="mailto:COI@visa.com">COI@visa.com</a></p>
People Team	Any HR-related issue, question or concern	<p><b>Email:</b> <a href="mailto:AskPeopleTeam@visa.com">AskPeopleTeam@visa.com</a></p> <p><b>Online (internal):</b> <a href="https://visaasknow.service-now.com/askpeopleteam">https://visaasknow.service-now.com/askpeopleteam</a></p>
Legal Department	Any legal-related issue, question or concern	<p><b>Online (internal):</b> <a href="https://insite.trusted.visa.com/content/insite/functions/legal.html">https://insite.trusted.visa.com/content/insite/functions/legal.html</a></p>
Global Privacy Office	Any questions related to data privacy	<p><b>Email:</b> <a href="mailto:Privacy@visa.com">Privacy@visa.com</a></p>



## Have a Question or Concern? (continued)

Contact	Issue or Concern	Contact Information
Corporate Communications	Any questions related to speaking on Visa's behalf, social media or media inquiries	Email: <a href="mailto:press@visa.com">press@visa.com</a>
Corporate Marketing	Any questions related to marketing or Visa's brand	Email: <a href="mailto:globalbrandreview@visa.com">globalbrandreview@visa.com</a>
Gifts and Entertainment	Any questions related to our gifts and entertainment policy	Email: <a href="mailto:AntiBriberyProgram@visa.com">AntiBriberyProgram@visa.com</a>
Government Engagement	Any questions related to political activities and lobbying	Email: <a href="mailto:USGovernmentRelation@visa.com">USGovernmentRelation@visa.com</a>
Visa Global Travel and Expenses	Any questions about the Travel and Expense policy	Email: <a href="mailto:TravelServices@visa.com">TravelServices@visa.com</a>
Global Security and Safety	Any questions related to health and safety in the workplace	Email: <a href="mailto:GSSGSOC@visa.com">GSSGSOC@visa.com</a>
Corporate Controller	Any questions related to financial and "accounting matters"	Email: <a href="mailto:VisaIncController@visa.com">VisaIncController@visa.com</a>

Have a Question or Concern? (continued)

Contact	Issue or Concern	Contact Information
Global Corporate Philanthropy and Responsibility (Inclusive Impact & Sustainability)	Any questions related to our corporate giving program	<b>Email:</b> <a href="mailto:SocialImpact@visa.com">SocialImpact@visa.com</a>
IFR Separation Compliance	Any issue, question or concern relating to separation of Scheme and Processing in the EEA and UK	<b>Email:</b> <a href="mailto:SeparationCompliance@visa.com">SeparationCompliance@visa.com</a> <b>Online (internal):</b> <a href="https://insite.trusted.visa.com/content/insite/resources/legal-compliance-resources/interchange-fee-regulation.html">https://insite.trusted.visa.com/content/insite/resources/legal-compliance-resources/interchange-fee-regulation.html</a>
CFA / Anti-Tax Evasion Facilitation Compliance	Any issue, question or concern relating to CFA or Anti-Tax Evasion Facilitation	<b>Email:</b> <a href="mailto:CFACompliance@visa.com">CFACompliance@visa.com</a> <b>Online (internal):</b> <a href="https://insite.trusted.visa.com/content/insite/resources/legal-compliance-resources/anti-tax-evasion-facilitation.html">https://insite.trusted.visa.com/content/insite/resources/legal-compliance-resources/anti-tax-evasion-facilitation.html</a>
Chair of the Visa Europe Limited (VEL) Board of Directors	In addition to the available contacts outlined in the Code, you may also raise any issues, questions or concerns related to VEL to the Chair of the VEL Board	<b>Email:</b> <a href="mailto:Hewittd@visa.com">Hewittd@visa.com</a>

## Have a Question or Concern? (continued)

Other resources	For help with	Contact Information
Insite	Employee intranet for Visa	<b>Online (internal):</b> <a href="https://insite.trusted.visa.com">https://insite.trusted.visa.com</a>
Employee Assistance Program (EAP)	Confidential referrals to support services for personal issues or concerns (e.g., child/ senior care, financial and legal services, drug or alcohol addiction)	<b>Phone:</b> 1-800-455-8185 <b>Email:</b> <a href="mailto:AskPeopleTeam@visa.com">AskPeopleTeam@visa.com</a>
Prescribed Persons	Under English law, employees may, in certain instances, report concerns directly to certain public bodies ("Prescribed Persons")	<b>Online:</b> <a href="https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2">https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2</a>

## Waivers of the Code of Business Conduct and Ethics

The Corporate Risk Committee must approve staff member requests for waivers of this Code. The Europe Risk Committee must also approve Visa Europe Limited staff member requests for waivers of this Code. Waivers for officers or directors, including waivers to the Code of Ethics for Certain Executive and Financial Officers (which contains additional requirements regarding the maintenance of the company's financial records and preparation of financial statements), may be made only by the Board of Directors or an authorized committee of the Board. These will be disclosed promptly as required by law, regulation or stock exchange listing requirements.



**VISA**

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