



On April 16, 2019, the Board of Directors approved the revised Code of Business Conduct and Ethics (Code). The Code was revised to add a new summary section, to provide greater clarity on confidential investigations and the formal resolution process, to clarify that close personal relationships between employees require disclosure, to update 'pay-to-play laws,' and to include additional language surrounding our compliance with the EU's requirement to separate our scheme and processing related activities.

VISA CODE OF BUSINESS CONDUCT AND ETHICS

Integrity. Everyday. Everywhere.

VISA everywhere
you want to be



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.

We have built a high level of trust with our clients, partners, shareholders and one another, but it is something we must continually earn. We have the opportunity to do that every day by acting in accordance with the highest ethical standards. Our Code of Business Conduct and Ethics reflects these standards and guides us in conducting business with integrity. Our leadership principles go hand-in-hand with the Code by driving accountability for the way we act and lead.

We value and encourage an open environment where people feel comfortable asking questions and raising concerns. By speaking up, if you see or hear something that isn't right, you are supporting our collective responsibility to protect Visa's outstanding reputation.

For all of these reasons, I ask each of you to be familiar with and always follow our Code. Thank you for helping to promote a strong ethical culture and protect our trusted brand.

Alfred F. Kelly Jr.
Chair of the Board and Chief Executive Officer
Visa Inc.



Our Leadership Principles

We lead by example

- Be accountable
- Treat others with respect
- Demonstrate a passion for our business

We communicate openly

- Promote a shared vision
- Communicate effectively
- Value others' perspectives

We enable and inspire

- Inspire success
- Remove barriers
- Value inclusivity and diversity

We excel with partners

- Build strong relationships inside and outside of Visa
- Provide excellent customer service
- Take a solutions-oriented approach

We act decisively

- Challenge the status quo
- Decide quickly
- Learn from our mistakes

We collaborate

- Break down silos
- Engage with our colleagues
- Deliver as One Team at One Visa

Table of Contents

Code of Business Conduct and Ethics: Summary	2	We Safeguard Our Assets and Information	16	We Comply With Gifting and Entertainment Rules	27
We Honor the Code	4	We Protect Our Assets	17	We Do Not Engage in Insider Trading	28
We Use Good Judgement	5	Physical Assets		We Compete Fairly	29
Using Our Code		Electronic Assets		Gathering Competitive Information	
We Speak Up	6	Information Security		Antitrust and Competition Law	
We Work Openly and Honestly	7	Confidential Business Information		We Respect Data Privacy	30
Confidential Compliance Hotline		Visa Information Classifications		What is Data Privacy?	
Everyone's Responsibilities		We Champion Financial Integrity	20	We Comply With Local Laws	31
Manager-Specific Responsibilities		Accuracy in Recordkeeping		Separation of Scheme and Processing	
We Foster a Culture of Integrity	10	Code of Ethics for Certain Executive and Financial Officers		Anti-Tax Evasion Facilitation	
We Respect Each Other	11	Records and Information Management		We Connect the World	32
Harassment and Discrimination		We Uphold the Law	22	We Speak on Behalf of Visa Only if Authorized	33
Relationships at Work		We Uphold the Highest Standards for Government Work	23	Media and Press Inquiries	
Workplace Violence		We Respect the Political Process	24	Using Social Media	
Alcohol and Drug Use		Personal Participation Outside of Work		We Give Back Responsibly	34
Protecting Employee Privacy		Visa's Participation		Corporate Citizenship	
Accessibility and Accommodations		We Adhere to Anti-Money Laundering, Anti-Terrorist Financing and Sanctions Laws	25	Charitable and Volunteer Activities	
We Avoid Conflicts of Interest	14	We Do Not Tolerate Bribery and Corruption	26	Resources	35
				Have a Question or Concern?	36



Code of Business Conduct and Ethics: Summary

Our Code of Business Conduct and Ethics reflects our commitment to the highest ethical standards and is core to the Visa brand. Our Code applies to everyone working with or on behalf of Visa, including employees, contingent staff and the Board of Directors. The Code centers around these principles:

1. We Foster a Culture of Integrity

This includes:

- Uphold the highest ethical standards every day at work. If you are unsure of what choice to make, ask yourself not only if it follows our policies or the law, but also whether it would affect the trust people place in Visa, or were disclosed in the news.
- Speak up. Be an upstander, not a bystander. If you have a concern or question, let your manager, [Human Resources](#), the [Compliance Department](#) or the [Legal Department](#) know, or use the [Confidential Compliance Hotline](#), which allows you to raise a concern anonymously.
- Visa will not tolerate retaliation against anyone who raises a concern in good faith or participates in an investigation.
- If you are a manager, you have additional responsibilities to serve as a role model, keep an open door, escalate concerns—and never tolerate retaliation.



2. We Respect Each Other

This includes prohibiting harassment or discrimination.

- Under no circumstances may an employee have a close personal relationship (dating, romantic or sexual relationship) with someone he or she supervises, or whose conditions of employment he or she may influence.
- In all other cases of a close personal relationship with another person at work, disclosure to [HR](#) is required.

3. We Avoid Conflicts of Interest

For example, outside employment, significant financial interests in (or close relatives who work for) an organization that has a relationship or competes with Visa, require approval by the [Business Conduct Office](#).

4. We Protect Our Assets

Protect, secure and use our assets appropriately for business purposes. This includes physical assets, electronic assets, information systems and intellectual property and confidential business information.

5. We Champion Financial Integrity

We are committed to maintaining records that accurately reflect our business activities, and to detecting and immediately reporting potential or actual fraud and concerns regarding questionable accounting matters or violations of securities laws.

6. We Uphold the Law

Visa is committed to complying with applicable laws in every decision we make, and in every action we take. This includes:

- Upholding the highest standards for government work, including procurement rules.
- Not doing business with sanctioned governments, jurisdictions, individuals and entities.
- Complying with Visa's Anti-Money Laundering/ Anti-Terrorist Financing Policy, including supporting Know Your Customers requirements for clients and partners.
- Zero tolerance for bribery and corruption and being especially careful when working with public officials and employees of state-owned enterprises.

- Never transacting in Visa stock, or “tipping” another person to trade in Visa stock, while possessing material non-public information about Visa unless specifically authorized.
- Gathering information about our competitors in a legal and ethical manner and avoiding agreements or practices that may limit competition.
- Strictly following data privacy policies, including collecting, storing, transmitting and using such data only in accordance with Visa policy and the law.
- Ensuring separation of European Economic Area and UK processing related activities from scheme activities—no matter where in the world you work.

Please continue below to review
the rest of the Code.



We Honor the Code

Visa makes paying for goods and services fast, convenient, secure and simple. We drive commerce over our global network, VisaNet, in approximately 200 countries and territories worldwide in partnership with over 16,000 financial institutions and tens of millions of merchants.

We have been able to change the way people pay and are paid around the world because of one simple word—trust. People trust the security and reliability of VisaNet and, most importantly, 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 Judgement

Using Our Code

Our Code of Business Conduct and Ethics reflects who we are as a company and our commitment to the highest ethical standards. Because every action and decision we make at all levels define who we are as a company, 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 that will help guide your decisions. Seek help if you have questions or need guidance.

We depend on you to use good judgement to protect Visa’s global reputation and to seek help if you need guidance.



Remember

- Refer to the Code to make the right decisions
- Use good judgement 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

- Does it follow our policies?
- Does it comply with the law?
- Will it help us maintain the trust people place in Visa?
- Would you feel comfortable if it were on the news or made public?

If you answered “no” to any of these questions, or if you are unsure, pause, evaluate the situation and ask for help. In addition, there may be situations where our Code may conflict with the local law or custom. In those cases, consult the [Legal Department](#).

What Would You Do



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

Contact your manager, senior management, the [Compliance Department](#), [Human Resources](#), the [Legal Department](#) or our [Confidential Compliance Hotline](#) to review the situation.



We Honor
the Code

We Speak Up

We Foster a Culture
of Integrity

We Safeguard Our Assets
and Information

We Uphold
the Law

We Connect
the World

Resources

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.





We Work Openly and Honestly

We act decisively to do what's right.

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. Optional channels for raising a concern include:

- Your manager or upper-level manager
- [Human Resources](#)
- [The Compliance Department](#) or the [Business Conduct Office](#)
- [The Legal Department](#)
- Our Confidential Compliance Hotline (see next page for more information)

Cooperate

Be sure to cooperate in any misconduct investigation. Failure to cooperate or interfering with an investigation may result in disciplinary action, up to and including termination.

No retaliation

We do not tolerate retaliation against anyone who participates in an investigation or raises a concern in good faith. Such retaliation may result in disciplinary action, up to and including termination.



After a Concern is Raised

When we learn about a potential violation of Visa policy or the Code of Business Conduct and Ethics, a confidential investigation is conducted. We address misconduct through a formal resolution process. Our goal is to ensure a safe and respectful environment where everyone can come and do their best work.



Note

Nothing in this Code or in any Visa policy prevents you from communicating directly with government agencies or law enforcement about actual or potential 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 Compliance Hotline

The Confidential Compliance Hotline, operated by a third party, lets you share your questions, concerns or comments online or by phone, 24 hours a day, seven days a week. You may report anonymously, where permitted by local law. Anonymous reports are more difficult to investigate—identifying yourself may expedite and ensure thorough review for the resolution of your concern.

Note that Visa’s processes incorporate local laws and regulations related to the reporting and treatment of concerns through the Hotline and inform staff from affected countries if restrictions apply to them.



Make a call: 1-888-289-9322 (see [AT&T guide](#) for the phone number in your country). If you wish to remain anonymous, you may indicate so when making your report. Whether anonymous or not, you will receive a unique password to provide before reading follow-ups via the Hotline portal.

In whatever way you choose to contact us, your concern or question will be addressed promptly, and your identity will be kept confidential to the fullest extent possible. You can also contact the [Business Conduct Office](#).

For questions about the Code of Business Conduct and Ethics or concerns regarding employee conduct, contact the [Business Conduct Office](#) or submit an inquiry or complaint. You may also make a report through Visa’s Confidential Hotline (online or call in). You can contact the Hotline [here](#).



How do I find the correct Hotline number in my country?

You can contact our Hotline from any location by going [online](#) or by phone using the instructions below:

1

Use the AT&T 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 [AT&T guide](#) for the phone number in your country)



Everyone's Responsibilities

We are all accountable for our actions and honor our commitment to act ethically and in compliance with the law.

Here are just a few ways we demonstrate ethics in every situation:

- **We lead by example.** Be a role model for others and support your team so they can follow your lead.
- **We inspire others.** Create a work culture that inspires employees to act with integrity and speak up with concerns.
- **We are always honest** in our business dealings internally and externally.
- **We are committed to complying with the Code,** company policies and all laws and regulations.
- **We seek guidance** from managers or other company resources when needed (refer to [Resources](#) for whom to contact).
- **We report suspected violations** of the Code, Visa policies or the law.
- **We encourage open communication** free from the threat of retaliation.

Manager-Specific Responsibilities

Managers have additional responsibilities and serve as role models. Managers are expected to:

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

Even those in leadership roles sometimes need help. If you are not sure of the proper course of action, seek guidance. Help your team find answers if they raise a concern that you cannot resolve. You can access the Ethical Manager's Toolkit [here](#).





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Resources

We Foster a Culture of Integrity

Promoting a culture of integrity requires all of us to demonstrate respect, ethical behavior, good business judgement and trust. This shared commitment is integral to protecting our company.





We Respect Each Other

We create a culture of inclusion where everyone is treated with dignity and respect.

Harassment and Discrimination

We value the individual differences, experiences and capabilities of each employee. Our collective strength—enhanced by the diverse backgrounds and perspectives of our worldwide teams—makes Visa a better place to work and a better business partner for our clients and merchants. We are strongly committed to equal opportunity in all employment decisions and promote a culture where everyone is treated with dignity and respect. Maintaining an inclusive environment also involves removing barriers experienced by employees with disabilities by providing reasonable accommodations when needed.

Visa prohibits any form of harassment or discrimination based on a protected class: race, color, sex, sexual orientation, gender identity or expression, creed, religion, age, marital status, national origin, ancestry, pregnancy, medical condition, veteran status, citizenship, physical or mental disability and any other characteristic unrelated to job requirements protected

by law. Discrimination or harassment based on a protected class may take the form of written or verbal, actions or visual such as photos or videos.

If you see, suspect or experience harassment or discrimination, report it to your manager, [AskHR](#), [Human Resources](#) or through [Visa’s Business Conduct Office \(BCO\) Hotline](#) by calling 1-888- 289-9322.

? What Would You Do

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

All Visa employees have the right to a positive work environment free of harassment and discrimination. If you feel your manager or anyone is discriminating against you or harassing you, seek help by reporting it to [Human Resources](#), [AskHR](#), [Compliance](#), or the [Confidential Hotline](#) (1-888-289-9322).



Relationships at Work

Relatives

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. Therefore, you are required to advise [Human Resources](#) or [AskHR](#) immediately if you are aware of the employment, or pending employment, of a relative.

Close personal relationships

Visa also recognizes that on occasion, employees may become involved in a close personal relationship (defined as dating or a romantic or sexual relationship). To ensure all potential conflicts of interest have been addressed, disclosure of the relationship to HR is required even if the employees are peers, work on different teams, have different functional roles or work in different locations (you may disclose using [AskHR](#)). This is a confidential process to help Visa assess any organizational impact from the relationship.

Under no circumstances may an employee in a management or supervisory position have a close personal relationship with an employee or contingent worker whom he or she supervises

(directly or indirectly) or whose terms or conditions of employment he or she may influence.

If you are unsure whether a relationship needs to be disclosed, contact [Human Resources](#) or the [Business Conduct Office](#) to discuss in confidence. For additional information on this topic, please see the [Employee Handbook](#).

Workplace Violence

We are committed to providing a safe and secure working environment. Report any activity or behavior that appears to be intimidating or violent or threatens the security or safety of our employees.

Remember—Visa employees, consultants, contractors and guests are prohibited from bringing any kind of weapon into any Visa facilities (except for authorized law enforcement officials), irrespective of any local laws that may permit such action. If you see someone with a weapon in a Visa facility, report it immediately to [Global Security and Safety](#).

Reporting a Safety Incident: If you need to report a safety hazard, injury or work-related illness, please notify Safety@visa.com, phone 1-571-439-7111 or toll-free 1-855-544-VISA (8472).



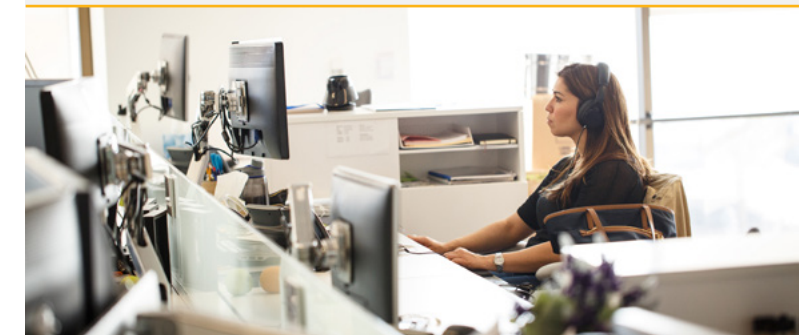
Close Personal Relationships

- A disclosure is required for dating, romantic or sexual relationships between employees
- Under no circumstances may an employee in a management or supervisory position engage in a close personal relationship with an employee or contingent worker in the same reporting line or whom he or she supervises (directly or indirectly) or whose terms or conditions of employment he or she may influence as per the HR Employee Handbook and Code of Business Conduct and Ethics.



Remember

- Immediately report anyone with a weapon to [Global Security and Safety](#)





Alcohol and Drug Use

Alcohol and drugs can impair your ability to perform your job and can place others at risk. Visa employees are prohibited from using, selling, possessing or being under the influence of alcohol, marijuana, illegal drugs or any illegal substance on our property or while working on our behalf. Prescription and over-the-counter medicine is permitted if you take it according to your doctor's instruction and you are able to safely perform your job.

Alcohol may be provided at some company events on Visa premises with advance approval from an Executive Committee member. At these events, we are still acting as representatives of Visa; use good judgement.

Protecting Employee Privacy

Visa respects the confidentiality of employee information. 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, and they may do so only for legitimate legal or business purposes. You have certain rights to access your own records.

Accessibility and Accommodations

As part of our efforts to maintain an inclusive workplace for our employees and increase financial inclusion for our customers, Visa is committed to improving the accessibility of our tools and products. When requested, Visa will provide reasonable accommodations to employees with disabilities and will continue to work with vendors to improve the accessibility of our internal tools. Our product and development teams should consider accessibility as a key requirement to avoid creating barriers to use for our users with disabilities.

If you require an accommodation due to a disability, consult with [Human Resources](#), or if you have a question about procuring or building accessible products, consult with Visa's [Accessibility Team](#).

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



Find out more

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





We Avoid Conflicts of Interest

Conflicts of interest threaten our viability. It is our responsibility to protect our company from situations that put our personal interests in conflict with the interests of Visa.

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 objectivity. If you become aware of a potential conflict, you have an obligation to disclose it.

At right are some situations commonly associated with potential conflicts and that must be disclosed per the Conflicts of Interest Policy. It is impossible to outline all potential conflicts of interest, so we must use good judgement in our day-to-day activities:

- **Outside employment**, including self-employment and consulting activities.
- **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 (e.g. sitting on the Board of a Visa entity or partner), or you wish to serve on a Board for any entity owned or controlled by you or your family.
- **Unpaid professional activities** for any organization that has a relationship with Visa.
- **Close relative** who works for any organization that has a relationship or competes with Visa in any way.



- **Previous employment** with a Visa business partner, where you are now involved in decisions regarding that organization.
- **Significant financial interests** in any organization connected to a payment service or related company or organization related to Visa.
- **Relationships with government officials** or offices that have influence over matters that could affect Visa business.
- **Prior government employment**

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 objectivity.

Commercial Boards

Additional requirements exist for serving on an advisory board, Board of Directors or equivalent fiduciary or advisory role for organization types not covered under the [Conflict of Interest Policy](#) (e.g., most for profit entities). For these situations, only employees at a job level of SVP or higher will be allowed to seek such roles, per the disclosure and approval processes required by the External Board, Advisory or Equivalent Roles Policy.

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](#).

Avoid situations that could:

- Impair objectivity in performing Visa job duties
- Cause or create a perception of favoritism to outside organizations or individuals
- Interfere with the ability to perform Visa job duties
- Create actual or potential harm to Visa's business or brand reputation



Remember

- Become familiar with situations that may present a conflict of interest
- Know when to disclose an outside activity for approval
- Seek help if you are unsure whether a situation creates a conflict of interest



Find out more

- [Conflict of Interest Policy](#)
- [External Board, Advisory or Equivalent Roles Policy](#)
- [Conflict of Interest Disclosure Form](#)
- [Anti-Bribery Policy](#)
- [Travel and Expense and Purchasing Card Program Policy](#)
- [Political Participation, Lobbying and Contributions Policy](#)



We Honor
the Code

We Speak Up

We Foster a Culture
of Integrity

We Safeguard Our Assets
and Information

We Uphold
the Law

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the World

Resources

We Safeguard Our Assets and Information

By safeguarding our physical assets, intellectual property and confidential business information and maintaining accurate financial records according to established guidelines, we ensure Visa's continued success.





We Protect Our Assets

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.

Physical Assets

These are tangible things like furniture, funds, supplies and facilities. We expect you to treat physical assets with care and take measures to prevent them from being lost, stolen or damaged. Let us know if any of our assets appear to be defective, unsafe or in need of repair.

Electronic Assets

Our technology resources, including computer hardware, software, mobile devices and tablets, are important to the work we do at Visa. We rely on you to protect, secure and use them appropriately for business purposes. Visa has strict rules about securing electronic assets, in the office and while traveling.

Occasional personal use of things, like email or the web, is generally permitted, but use good judgement, 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. In addition, Visa may review the contents of Visa systems at any time, where permitted by law. Be careful in how you use our electronic assets and never use them to engage in illegal activity, activity that violates our policies or anything that would negatively affect our company or its reputation.

We depend on you to do what is right and take appropriate measures to preserve our confidential business information.



Information Security

As a global payments technology company, some of our most valuable assets are intangible. Information drives our business and allows us to connect people globally. Our intellectual property is an important asset and critical to our business. Both our information systems and our intellectual property are especially vulnerable to security risks.

Protecting our information systems

When using our information systems and technology, do your part to protect them from viruses, data breaches and other risks.

Never:

- Install unapproved software, applications or hardware
- Use unauthorized devices to access our network
- Access unauthorized websites
- Share passwords or access codes
- Open suspicious or unsolicited email

Anything you create, design or develop within the scope of your work for Visa is the sole property of our company.

Respecting intellectual property

The innovative ideas we develop in our work, such as patents, trademarks and the Visa brand, are all forms of intellectual property. Protect our intellectual property—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.

Our responsibilities also include respecting the intellectual property rights of others. We take care not to infringe patents, trademarks or other rights. Intellectual property is a critical component of our business and the business of others. We all must do our part to ensure that it is protected.

Confidential Business Information

While working at Visa, you may have access to confidential business information or trade secrets about our company or our clients or vendors. This information provides Visa with a competitive advantage and could cause harm if made public without permission. 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

Treat our confidential business information with care — just as you would your own personal information. Before sharing any confidential business information, consult with the [Legal Department](#) even if you think you have permission to disclose it. Be sure to properly label and identify it with the appropriate classifications. Visa employees may have access to sensitive information, including non-public cardholder and payment account information. Refer to the [Respecting Data Privacy](#) section for additional information.



Once you confirm you can disclose confidential business information, be cautious. Disclose only to people who are authorized to have it and share only what is required. Make sure the person who receives the information understands any restrictions related to its use or dissemination.

Safeguard our confidential business information

- Do not leave it where others can see or have access to it
- Access and store it only on approved devices
- Do not discuss it in public places
- Make sure confidential documents are secure always, even if they are in your desk or office
- Dispose of all confidential information according to our policies

We depend on you to do what is right and take appropriate measures to preserve our confidential business 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.

Help us protect company assets. If you know or suspect that any of our assets have been lost, stolen or misused, report it immediately (within 24 hours) to [Global Security and Safety](#). They will promptly investigate the matter and take appropriate action.

Visa Information Classifications

As a Visa employee, you help protect the company and ensure its continued success by handling information according to established guidelines. Doing so helps Visa avoid business harm or legal exposure that could result if information were to be used or disclosed without restriction.

Learn more about how [Visa's Information Classifications](#) (Visa Public, Visa Confidential, Visa Restricted and Visa Restricted—Personal Information) apply to documents you create or handle.



Remember

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



Find out more

- [Visa Information Classifications](#)
- [Key Controls](#)



Note

Nothing in this Code or in any Visa policy prevents you from communicating directly with government agencies or law enforcement about actual or potential 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.



We Champion Financial Integrity

At Visa, integrity defines everything we do. We are committed to maintaining records that accurately reflect our business activities.

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 forgery, extortion, theft, misappropriation of assets, embezzlement, false financial reports or omissions of material information.

Accuracy in Recordkeeping

We depend on you to maintain accurate records that appropriately support business transactions in our financial statements by following our internal controls, finance policies and procedures and recordkeeping policies. Even internal business records and communications may become public, which is one of the reasons why it is important to avoid exaggerated information, inappropriate language or characterizations or guesswork in our recordkeeping.

Expense reports

Many Visa employees regularly use company issued corporate cards or purchasing cards (PCards) to charge business expenses such as travel or other miscellaneous expenses. When using these cards, make sure you record and document expenses timely and accurately and seek help from your manager or [Controllershship](#) if you are unsure if an expense is permissible.

Questionable accounting matters

Our policies protect those who report concerns regarding questionable accounting matters and violations of securities laws, to the extent possible, including:

- Fraud or errors in the audit or evaluation of financial statements or in maintaining financial records
- Noncompliance with our internal accounting policies or controls
- Misrepresenting our company's financial condition

Continued on next page



Remember

All of Visa's books, records, accounts and financial statements must:

- Be appropriately detailed
- Accurately reflect Visa's transactions
- Conform to legal requirements
- Comply with Visa's policies and internal controls



What Would You Do

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

No. You are required to record transactions ethically and honestly. You should ask him to provide the supporting documentation, and if he does not provide it, contact your manager, the [Corporate Controller](#) or our [Hotline](#) for help with the situation.



If you have a question or concern regarding questionable accounting matters:

- Contact Visa’s [Compliance](#) or [Legal Department](#)
- Contact the [Business Conduct Office](#)
- Contact our [Hotline](#)

We are committed to maintaining records that accurately reflect our business activities. Follow our policies and report any activity that you believe is suspicious or fraudulent to the [Corporate Controller](#) or through one of the ways described above.

Code of Ethics for Certain Executive and Financial Officers

The Code of Ethics for Certain Executive and Financial Officers are additional requirements that apply to our Chief Executive Officer (CEO), General Counsel and certain financial officers (which includes the Chief Financial Officer, Chief Accounting Officer, Controller and any persons performing similar functions).

These officers shall promptly notify the General Counsel, who will review with the CEO, Disclosure Committee, Audit and Risk Committee or Board of Directors, as appropriate the following items:

- Any material information that could affect our public filing disclosures

- Any significant deficiencies 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

All of us have a responsibility to handle our records with care and maintain them according to the law and our policies. Retain records and information for the appropriate length of time and securely dispose of records that are no longer needed to meet our legal, tax, regulatory and operational requirements as designated in the Records Retention Schedule. Make sure you never dispose of any records or information if you have been notified by the [Legal Department](#) that it could be relevant to an investigation or subject to a legal hold.



Remember

- Report any suspected fraud or misrepresentation in our records
- Record financial transactions accurately
- Keep records according to our policies and internal controls
- 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](#)
- [Wireless Device Policy](#)
- [Information Technology Asset Management Policy](#)
- [Intellectual Property 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. It is part of our shared commitment to integrity.





We Uphold the Highest Standards for Government Work

Governments around the world trust Visa to move them forward. We are honored by our partnerships that connect the world. That honor comes with great responsibility. We relish the opportunity while striving to meet and exceed the highest ethical standards.

We appreciate the importance of conducting business with governments around the world. If your job relates to a government contract, recognize that the rules are often stricter than those that apply when working with private companies.

When doing business with government, always:

- Learn the rules around the procurement process if you are dealing with government contracts

Rules for partnerships with government are often stricter than those that apply to private companies.

- Consider legal and local government requirements that may apply to your work, and contact [Government Engagement](#) or the [Legal Department](#) if you have questions
- Submit accurate, timely and complete documents
- Follow applicable policies, including those related to gifts and entertainment and anti-bribery and anti-corruption
- In the United States, be mindful of state and local “pay-to-play laws” that can impact your personal political contributions—for more information, or if you have questions, please email PayToPlay@visa.com

Being a transparent, honest and open partner will help us maintain our relationships with our government partners.



We Respect the Political Process

You have a right to participate in politics, and the Code provides guidance to protect you and the Visa brand.

Personal Participation Outside of Work

Visa respects your right to be involved in, and participate in, the political process. If you wish to run for or accept appointment to or employment in government office, seek pre-approval from [Government Engagement](#) and your Executive Committee member. Also, remember your views and actions when engaging in political affairs are your own and not those of Visa. Do not use Visa resources, including work time, to engage in political activities.

Visa's Participation

Various rules restrict our company from contributing to federal candidates or political parties in the United States. We do use corporate funds, however, for contributions to state or local candidates and in a limited number of countries outside the United States where permitted and always in accordance with the law. Only [Government Engagement](#) may make corporate political contributions using company funds. Also remember that employees need to get approval from [Government Engagement](#) before participating in any lobbying activity on behalf of Visa.

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



Remember

- Notify [Government Engagement](#) if running for or accepting appointment to or employment in public office and receive pre-approval before proceeding
- Be aware that any use of corporate funds for political purposes must be made through [Government Engagement](#)
- Comply with Visa policies that involve working with government, including:
 - Antitrust and competition
 - Anti-bribery and corruption
 - Gifts and entertainment
- Follow all government contractual requirements



Find out more

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





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

We do not do business with criminals, terrorists and sanctioned governments, entities or individuals. We are all responsible for identifying and reporting any suspicious activity to the Global AML and Sanctions Compliance Office.

Visa is committed to complying with applicable anti-money laundering, counter-terrorism financing and sanctions laws and regulations. When requested, it is imperative that you assist the AML and Sanctions Compliance Office in carrying out the controls we implement to comply with these laws and regulations. Failure to do so may result in reputational harm and financial losses for Visa.

Collectively, anti-money laundering, anti-terrorist financing and sanctions laws and regulations may restrict Visa's ability to do business with certain individuals, entities, governments and jurisdictions.

- 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, as well as individuals and entities designated under programs related to terrorists and international criminal organizations, weapons of mass destruction, narcotics trafficking and more.

Visa conducts its business in compliance with applicable anti-money laundering, anti-terrorist financing and economic sanctions laws and regulations. Our decision to do business with various partners is guided by an interest in following applicable laws and protecting our payment system and reputation.



Remember

- Comply with Visa's Anti-Money Laundering and Anti-Terrorist Financing and Sanctions Policy
- Reach out to AML and Sanctions Compliance Office if you have questions
- Conduct risk-based due diligence on Visa clients that access our payment system
- Conduct business with reputable partners
- Follow requirements related to sanctioned governments, jurisdictions, individuals and entities



Find out more

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



We Do Not Tolerate Bribery and Corruption

We believe that the right way to do business is the only way to do business. We have zero tolerance for bribery and corruption because we are committed to fair and honest competition.

We are committed to winning business through fair and honest competition in the marketplace. Never offer, promise or pay anything of value to someone with the intention of improperly influencing an official action or business decision to secure a business advantage. Visa is subject to the United States Foreign Corrupt Practices Act (FCPA), as well as applicable anti-corruption laws of other countries in which we operate. The consequences for giving or accepting a bribe can be severe for Visa and for you as an individual.

Be particularly careful when interacting with public officials, including employees of state-owned enterprises. Many countries, states and local jurisdictions have limits and restrictions on what gifts and other things of value can be offered to these parties. Know the thresholds and expectations of the locations in which you operate. While gifts and business entertainment provided to a public official for a legitimate business purpose may be reasonable in some locations, they may violate legal thresholds or be

prohibited circumstances in others. Adhere to all local laws and contact the [Compliance](#) or [Legal Departments](#) if you are ever in doubt about the law or identifying someone as a public official.

Remember, third parties cannot be used to make offers or payments that Visa cannot lawfully make itself. You must never offer something of value to a third party if you suspect it may be passed along to a public official or a key decision maker in a pending business deal to improperly influence their decision making. We will take necessary actions to confirm third parties working on our behalf are not making unlawful payments without our knowledge. To protect yourself and Visa, follow our procurement procedures that vet and authorize the use of third parties. If you suspect a third party is misusing funds from Visa (or its own funds) to make illicit payments, report your suspicions to the [Compliance Department](#).



Remember

- Do not offer anything of value or any advantage to anyone to influence a business decision
- Be especially careful when working with public officials, including employees of state-owned enterprises
- Exercise due diligence when engaging third parties
- Follow our policies relating to gifts and entertainment
- Be sure to maintain accurate, detailed records



Enforcement

Consequences for violating anti-bribery laws are increasingly severe, not just for corporations, but also for individuals. Criminal and civil enforcement actions are on the rise, often carrying harsh sentences and large monetary fines and penalties.



Find out more

- [Anti-Bribery Policy](#)



We Comply With Gifting and Entertainment Rules

A small gift can strengthen a relationship, but crosses the line when it seeks to influence a business partner. Knowing and following guidance for gifting and entertainment protects our brand and our reputation.

It can be common practice to offer or receive gifts or entertainment to create goodwill and strengthen working relationships, but if you are not careful, this can present a conflict and, in some cases, violate the law. You should never accept or provide meals, entertainment, travel or gifts that may influence or appear to influence the recipient or your ability to make objective decisions on Visa's behalf.

Be careful when offering or receiving gifts, meals, travel or entertainment as they may influence or appear to influence decision making.

Do your part to help us preserve our global reputation—do not use your position at Visa for personal gain and never accept or provide improper personal gifts from or to a potential or existing vendor, client or business partner. If you are not sure whether the [Travel and Expense and Purchasing Card Program Policy](#) and [Guidelines](#) permits a meal, gift or entertainment event, seek help from your manager, your local [Controllership](#) contact or regional card program administrator or [Global Compliance](#).



Find out more

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





We Do Not Engage in Insider Trading

Not only is insider trading unethical, it is illegal. We are also responsible for avoiding improper transactions, such as hedging, pledging or short selling.

While working at Visa, you may have access to material, nonpublic information about Visa or you may learn of material, nonpublic information about other companies such as our clients, vendors or partners. Information is considered “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding to trade in the public securities of the company. This type of information is often referred to as “inside information,” and people who have access to this type of information are often referred to as “insiders.” Examples of potential material, nonpublic information include:

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

Transacting in Visa stock (including exercising options) while in possession of inside information about Visa or in the stock of another company while in possession of inside information about that company obtained in connection with your employment with Visa is called insider trading and is not only unethical but also illegal and may include civil and criminal penalties. Passing along that information in the form of a “tip” to someone who then utilizes it to trade in that stock is also considered insider trading. It is important to avoid even the appearance of an improper transaction.

Additionally, certain types of transactions involving Visa stock are not allowed, such as hedging, pledging or short selling. Refer to [Prevention of Insider Trading Policy](#) for more information.



Find out more

- [Prevention of Insider Trading Policy](#)



What Would You Do

What if, in talking with one of Visa’s vendors, you learned 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 increase in value. Can you share this information with your sister-in-law, who is looking to invest?

No. This is likely to be considered inside information. Sharing it would be considered a “tip” that could influence her decision to buy stock, which is illegal, and for which both of you could face criminal penalties.



We Compete Fairly

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

Gathering Competitive Information

We want to outperform our competition based on the merits of our products and services, not because of unfair business practices. That is why when we gather information about our competitors, we never:

- Possess or use proprietary information without authorization
- Act in ways that are unethical or unlawful
- Use others to help obtain information through improper means

Sometimes it is useful to gather information about our competitors, but it should be done legally and ethically. Use public sources whenever possible. Use good judgement and avoid even the appearance of anything inappropriate. If you receive information that you believe is confidential or obtained unethically, speak up or contact the [Legal Department](#).

Antitrust and Competition Law

Antitrust and competition laws prohibit certain types of agreements and practices that restrict competition. We comply with these laws and do our part to promote a fair, competitive marketplace.

These laws are complex and may differ from country to country. Make sure you understand the laws that apply to your work. Any time you have questions about how antitrust and competition laws apply to a particular situation, seek advice from the [Legal Department](#). If some individual tries to raise topics with you that you think may be anti-competitive, stop the conversation immediately and report this exchange to the [Legal Department](#).



What types of agreements or practices should I avoid?

You should avoid agreements or practices that may limit competition, such as:

- Agreeing with a competitor to set prices or divide territories, markets or clients
- Agreeing with a competitor to restrict sales or manipulate a competitive bidding process
- Imposing or participating in restrictions on clients or suppliers that may restrict the competitive process



Find out more

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



We Respect Data Privacy

Our business depends on safeguarding all personal information.

Visa is committed to protecting the personal information of our accountholders, customers, employees and other relevant individuals, and we have adopted policies to safeguard their information from unauthorized use or disclosure. Visa employees with access to personal information, including nonpublic consumer personal information and payment account information, should collect, store, transmit and use this information only in accordance with Visa’s policies and in compliance with applicable data protection laws. We count on you to adhere to [Visa’s Global Privacy Policy](#) and [Key Controls](#). If you ever have any questions or concerns about how you should collect, protect, use or share personal information or payment account information, contact the [Global Privacy Office](#).

What is Data Privacy?

- Data privacy refers to the protection of “personal data” (also called “personal information”), which is any information that identifies or can identify an individual
- We protect personal data to comply with data privacy laws, prevent harm and protect an individual’s rights

Visa employees with access to personal information should collect, store, transmit and use this information in accordance with Visa’s policies and applicable data protection laws.



Remember

- Restrict access only to those who have a legitimate business purpose
- Maintain security in accordance with key controls



Find out more

- [Global Privacy Policy](#)
- [Key Controls](#)





We Comply With Local Laws

As a global company, we comply with laws and regulations from around the world. That includes European Economic Area (EEA) and UK regulations that require separate scheme and processing activities and regulations regarding Tax evasion.

Separation of Scheme and Processing

As a result of the Interchange Fee Regulation (IFR) that is in effect in the EEA and UK, our European operations (including our operations in the UK) are required to maintain separate scheme and processing activities and may not share sensitive information between Scheme and Processing.

To comply with these IFR obligations, relevant processing related activities in Europe are carried out by Visa Technology and Operations, while 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 additional information on separation of scheme and processing, please contact SeparationCompliance@visa.com.

Anti-Tax Evasion Facilitation

Tax evasion is criminal, as is assisting or facilitating the tax evasion of others. Visa may be held criminally liable if any of its employees or other associated persons facilitate the evading of another individual or company's tax.

Visa has a zero-tolerance approach to tax evasion, and employees must ensure that activities and processes are not used to assist or facilitate the tax evasion of others.

If you have any questions or concerns please escalate them to your line manager, your Regional Compliance Officer, Legal or 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
- CFAcompliance@visa.com





We Honor
the Code

We Speak Up

We Foster a Culture
of Integrity

We Safeguard Our Assets
and Information

We Uphold
the Law

We Connect
the World

Resources

We Connect the World

Visa is the world's leading payments technology company powering the digital economy. Our mission is to connect the world through the most innovative, reliable and secure payment network – enabling individuals, businesses and economies to thrive.





We Speak on Behalf of Visa Only if Authorized

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

Everything we say on behalf of Visa affects our reputation. Anyone who speaks on behalf of Visa must be authorized to do so by [Corporate Communications](#) and ensure all messages are accurate, aligned with our brand and legally approved.

What Can You Do



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

We expect you to use good judgement when you post information online about our company, fellow employees or your job. Always protect our confidential business information, ensuring you follow Visa's Key Control Policy. You are responsible for any content you publish, and you may not speak on behalf of Visa without receiving prior approval.

Media and Press Inquiries

If a member of the media or someone from a research, industry analyst or investor firm contacts you with a request for a statement, comment, opinion or position on any topic, please refer these inquiries to the [Corporate Communications](#) team. You may not speak on Visa's behalf without prior authorization and approval. If you believe you have a need to speak publicly, you must submit a request using the [Speaking Authorization Form](#) and receive approval. You must also follow Visa's [Public Communications and Advertising Governance Policy](#).

Using Social Media

Social media is widely used socially and professionally. However, be thoughtful and cautious about what you choose to share online and follow Visa's Social Media Policy. Social media use by Visa staff according to the policy, whether for Visa business purposes or for personal purposes during work time, is subject to all applicable Visa policies. Social media should never be used in a way that violates any Visa policy or other legal or ethical obligation. Discriminatory remarks, harassment, threats of violence or other inappropriate or unlawful conduct will not be tolerated and may result in disciplinary action.



Remember

- Be respectful when using social media outlets within Visa
- Using social messaging applications outside of the Visa network to conduct business requires pre-approval by Information Technology
- Be clear when you post online that your opinions are your own and not those of Visa
- Protect our confidential business information
- Do not disclose anything that could violate the privacy of our employees or clients



Find out more

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



We Give Back Responsibly

Giving back is part of our commitment to helping everyone find their everywhere. We strive to make a difference while maintaining our high ethical standards.

Corporate Citizenship

As good corporate citizens, we strive to make a positive difference in communities around the world. Our corporate giving activities focus on helping micro and small enterprises thrive, advancing financial inclusion for the unbanked and underserved, supporting financial literacy, responding to humanitarian crises and contributing to our local communities. Visa's charitable efforts are steered by a core strategy managed by the Social Impact function, overseen by the Charitable Contributions Committee and guided by the [Charitable Contributions Policy](#).

Only authorized employees are permitted to review and approve charitable contributions on behalf of Visa. This helps ensure Visa is meeting our ethical standards and complying with the law and our policies. Employees should not make any commitments or donations of Visa resources (financial, in-kind goods or services, etc.) unless you are specifically responsible for executing Visa's

philanthropic strategy. For more information about our corporate giving program, please contact [Social Impact](#).

Charitable and Volunteer Activities

We encourage you to contribute to causes that you care about. We support various activities through our Employee Volunteer and Matching Gift programs. These programs were created to help you give back to your community through direct service and charitable donations.

When participating in charitable and volunteer activities, do not allow your involvement to create a conflict of interest or reflect negatively on our company. Also, remember to keep your manager apprised of Visa-sponsored volunteer activities that may occur during work hours.



Remember

- Employees must seek advance approval from [Social Impact](#) prior to making any commitment to a charitable organization, regardless of whether such commitment is of a charitable nature (donation of money, in-kind goods or services) or of a business nature (sponsorship, services rendered).
- Keep your manager apprised if you plan to participate in Visa-sponsored volunteer activities during work hours



Find out more

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



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and Information

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the Law

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the World

Resources

Resources

It is up to all of us to do the right thing.
We are not in this alone, and we have resources
available to help you 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 and raise concerns if you see or suspect any activity that violates our Code.

Contact	Issue or concern	Contact information
Confidential Compliance Hotline	Any issue, question or concern	Phone: 1-888-289-9322 Web: https://visa.alertline.com or https://insite.trusted.visa.com/content/insite/functions/legal/compliance.html
Compliance Department	Any Code-related issue, question or concern	Online (internal): https://insite.trusted.visa.com/content/insite/functions/legal/compliance.html
Business Conduct Office	Any Code-related issue, question or concern	Online: https://insite.trusted.visa.com/content/insite/functions/legal/compliance/business-conduct-office.html Address: Visa Inc., Business Conduct Office, 900 Metro Center Blvd., Foster City, CA 94404
Conflict of Interest Program	Any disclosure, issue, question or concern related to conflicts of interest	Email: COI@visa.com
Human Resources	Any HR-related issue, question or concern	Email: AskHR@visa.com Online (internal): http://askhr
Legal Department	Any legal-related issue, question or concern	Online (internal): https://insite.trusted.visa.com/content/insite/functions/legal.html
Global Privacy Office	Any questions related to data privacy	Email: Privacy@visa.com
Corporate Relations	Any questions related to speaking on our behalf or media inquiries	Email: VisaInc.Corporate@visa.com
Corporate Marketing	Any questions related to marketing or communications	Email: MarketingCommunicat@visa.com
Gifts and Entertainment	Any questions related to our gift and entertainment policy	Email: GlobalCompliance@visa.com



Government Engagement	Any questions related to political activities and lobbying	Email: USGovernmentRelation@visa.com
Visa Global Travel and Expenses	Any questions about the Travel and Expense policy	Email: TravelServices@visa.com
Global Security and Safety	Any questions related to health and safety in the workplace	Email: GSSGSOC@visa.com
Corporate Controller	Any questions related to financial and “accounting matters”	Email: VisalncController@visa.com
Global Corporate Philanthropy and Responsibility (Social Impact)	Any questions related to our corporate giving program	Email: SocialImpact@visa.com
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	Email: Hewittd@visa.com

Other resources**For help with****Contact information**

Insite	Employee intranet for Visa	Online (internal): http://insite2
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)	Phone: 1-800-455-8185 Email: AskHR@visa.com
Prescribed Persons	Under English law, employees may, in certain instances, report concerns directly to certain public bodies (“Prescribed Persons”)	Online: https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

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 and will be disclosed promptly as required by law, regulation or stock exchange listing requirements.