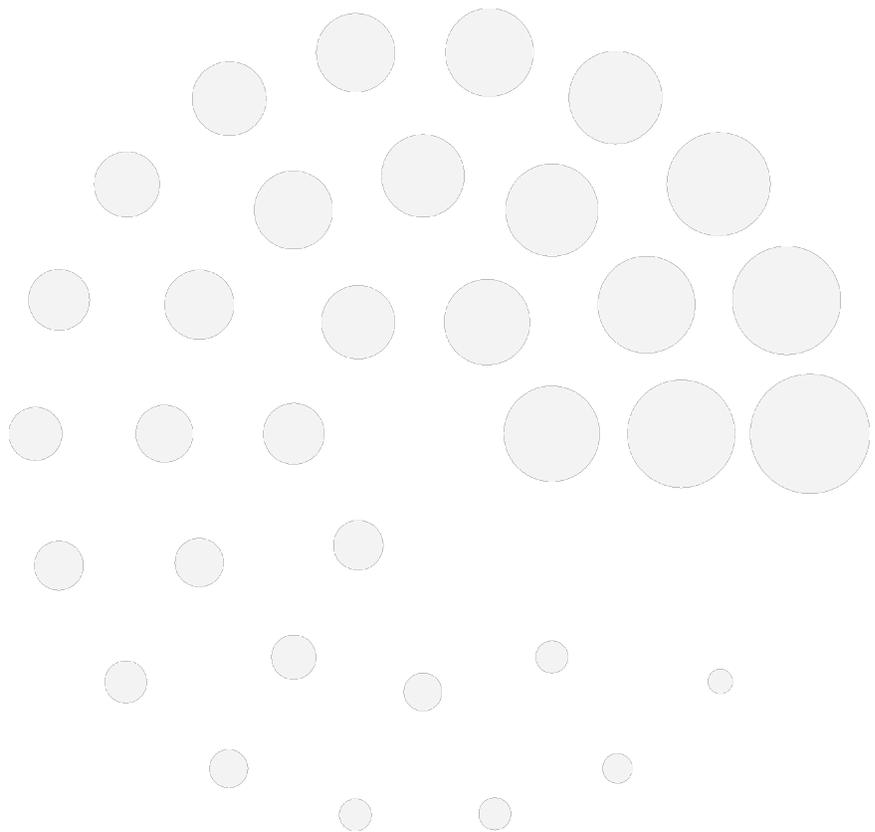




CODE OF ETHICS FOR VENDORS AND SERVICE PROVIDERS

Responsible Unit: Legal and Compliance



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Our Vision

To transform and simplify daily life in our society.

Our Mission

To be the leading fully integrated end-to-end secure payment services and business solutions Company in the Americas.

Our Values

Maximize Business Results
Drive Customer Success
Inspire Change in Our Community
Treasure Our Employees

ETHICAL PRINCIPLES

Integrity

is the value that describes the essence of OUR professional conduct.

Honesty

is the foundation for the execution of OUR business practices.

Good Faith

is the strengthening of OUR co-workers and clients' trust.

“Whenever you do a thing, act as if all the world were watching.” -Thomas Jefferson

ETHICAL RESPONSIBILITIES

Code of Ethics

EVERTEC, Inc. and its subsidiaries (collectively “EVERTEC” or the “Company”) are committed to integrity, honesty and good faith in all areas. These principles define our corporate culture and are the basis of every activity in which we are involved. This Code of Ethics for Vendors and Service Providers (the “Code”) defines and reaffirms these high standards. Each vendor and service provider (collectively, the “Service Providers”) is expected to adhere to the ethical principles and procedures set forth in this Code, and ensure that their employees, subcontractors and agents also comply with this Code.

This Code does not establish rules, nor does it have answers, for every ethical or unethical situation that could potentially occur in our business dealings and relationships. Its objective is to provide guiding principles to help us prevent, detect and understand what constitutes ethical, unethical, illegal or inappropriate behavior. When questions or concerns arise, please seek guidance and advice from EVERTEC’s Legal & Compliance Division, Human Resources Division or Compliance and Ethics Officer. If by any chance your questions or concerns are related to any audit, finance or accounting issues, you can also seek guidance from our Chief Financial Officer, Internal Auditor or the Audit Committee. You may also report concerns or violations anonymously through <http://www.evertecthicsline.com>.

Depending on the country, this Code may be supplemented or replaced by the laws or regulations of the jurisdiction in which any of our employees, officers, or directors are doing business in. This Code is part of EVERTEC’s compliance program and constitutes an important tool of its internal control structure.

Compliance with the Code

EVERTEC appreciates all the efforts performed by its Service Providers to maintain the highest ethical standards in their business interactions. By upholding these standards, they help enable EVERTEC to do the same, while also contributing significantly to our success. This Code helps Service Providers fully understand EVERTEC's commitment to complying with all laws, rules and regulations applicable to the engaged service.

For the purpose of this Code, Service Provider refers to an organization, independent contractor, individual or other non-affiliated entity engaged by EVERTEC to provide goods and/or services to EVERTEC or its clients, which fall within the scope of this Code. The definition is inclusive of domestic or international business partners, merchant acquiring, payment processing and business process management services providers; sales agents, sales agencies, delegates, vendors, suppliers, contractors, consultants and related entities acting on behalf of EVERTEC, either directly or indirectly. It excludes wholly owned subsidiaries of EVERTEC and their employees.

A violation to this Code, which includes a failure to report potential violations by others, will be regarded as a serious offense and may result in termination of the business relationship with EVERTEC. If you believe in good faith that a violation of this Code has occurred, please contact the Director of the Legal and Compliance Division or the Compliance and Ethics Officer, or report the violation using the EVERTEC Ethics Line. Your understanding of this commitment and willingness to raise ethical concerns are essential to the well-being of EVERTEC's clients, as well as the success of both you and EVERTEC.

Ethical Business Decisions

Service Providers have the responsibility to serve EVERTEC, its directors, officers, employees and clients while employing the highest standards of compliance and ethics. The following are general guidelines that will help you in complying with your responsibility:

- Always avoid any conflict of interest or even the appearance of a conflict of interest.
- Always comply with applicable laws, rules, regulations and Company policies.
- Act in good faith, responsibly, with due care, competence and diligence in your business transactions with EVERTEC.
- Protect the confidentiality and prevent the unauthorized disclosure of non-public information (whether material or not) about EVERTEC, its customer, suppliers and other third parties.
- Protect the tangible and intangible assets of EVERTEC at all times and use them only for legitimate business purposes.
- Never use or attempt to use your relationship with EVERTEC to obtain improper personal benefits.
- Report any conduct believed to be ethically questionable, a conflict of interest or a violation of law, including transactions or relationships that could reasonably be expected to give rise to such a violation.

Consider your actions and ask for guidance. If you are uncertain about a course of conduct, ask yourself:

- It is legal?
- It is ethical?
- It is consistent with the Code?
- Will it reflect well on me?
- Will it reflect well on the Company?

If the answer to any of these questions is NO, you should not do it.

Conflicts of Interest

You must avoid conflicts of interest or the appearance of a conflict of interest. A conflict of interest occurs when a Service Provider's private or personal interests (i) influences or appears to influence the objective exercise of the Service Provider's duties; (ii) affects or appears to affect the Service Provider's impartiality; (iii) interferes or appears to interfere with the interests of EVERTEC or is otherwise inconsistent with the interests of EVERTEC. Conflicts of interest are prohibited as a matter of corporate policy. You should never use or attempt to use their status as an EVERTEC Service Provider to obtain any improper personal benefit for yourself or any other person or entity. Business decisions and actions must be based wholly on the best interests of EVERTEC and must not be motivated by personal considerations or relationships.

Conflicts of interest are present in personal or business relationships that could lead to, but are not limited to: (1) bribes, kickbacks, (2) improper use of information, or (3) competing with any of EVERTEC's lines of business. Because it is impossible to describe every potential conflict, EVERTEC must rely on your commitment to exercise sound judgment. Should you become aware of a conflict of interest or if you are concerned that a conflict might develop, you must promptly refer the matter to EVERTEC's Compliance and Ethics Officer. Furthermore, all Service Providers are required to disclose to the Compliance and Ethics Officer any material transaction or relationship that could reasonably be expected to give rise to such a conflict or the appearance of such a conflict.

Gifts and Other Things of Value

A gift is anything of value that you give or receive without having to make a payment, or at a discount that is greater than the one available to a similarly situated person. With certain exceptions, such as nominal gifts or courtesies that are unsolicited, lawful and infrequent, Service Providers should never offer or provide directly or indirectly, gifts, services, loans or other things of value including cash, money, bribes and kickbacks, to any EVERTEC director, officer, employee, supplier, business partner or customer. Such prohibition includes but is not limited to a Service Provider offering or providing a consulting, employment or similar position to any EVERTEC employee, or the employee's family member or significant other. Service Providers may not provide or allow their close family members to provide to EVERTEC employees, customers, suppliers or others anything of value in exchange for past, current or future business relations with EVERTEC. If the Service Provider is unsure whether a particular gift or service is permissible, it must contact EVERTEC's Compliance and Ethics Officer. Furthermore, accepting gifts, favors, travel and entertainment may create a conflict of interest with the Service Provider's obligations to EVERTEC, as well as constitute a violation of law.

Relationship with Our Board of Directors

You must disclose if you are either a relative of, or in a close relationship with, a member of the EVERTEC's Board of Directors or an executive officer. The relationship must be promptly notified in order to determine how the situation should be handled and avoid any possible conflicts of interest.

Corporate Opportunities

In your role as a Service Provider, you may be presented with corporate or business opportunities related to EVERTEC's businesses. In that circumstance, prior the use of EVERTEC's property or services, you must obtain the prior approval of EVERTEC's Compliance and Ethics Officer. Furthermore, except as otherwise provided in EVERTEC's certificate of incorporation, you must comply with the following obligations, responsibilities and prohibitions regarding corporate opportunities:

- Advance EVERTEC's business interests when the opportunity to do so arises
- Refrain from taking or directing to a third party a business opportunity discovered through the use of Company property, information or position, unless EVERTEC has already been offered the opportunity and turned it down in writing
- Abstain from using Company property, information or your position to compete with EVERTEC or for personal gain

If there is a conflict between the Code and EVERTEC's certificate of incorporation regarding this matter, the provisions of the certificate of incorporation will prevail.

Speak Up on Ethical and Compliance Issues

If at any time you observe or become aware of a behavior that concerns you, or that you suspect may represent a violation of this Code, you must report the issue promptly, even if you're not sure if it is unethical. By speaking up when ethical and compliance issues arise, you provide EVERTEC an opportunity to address the situation and correct it, ideally before a violation of the law, or a risk to the health or security of fellow employees occur. Questions concerning the best course of action in a particular situation, as well as all reports of a suspected or actual violation of a law, regulation or ethical standard must be immediately addressed to our Compliance and Ethics Officer. If you wish to remain anonymous, rest assured that you can report a concern in a confidential and anonymous manner through EVERTEC's Ethics Line at <http://www.evertecethicsline.com>, at any time and from any computer, whether corporate or personal. Failure to report any such violation or potential violation by others is in itself a violation of this Code. We encourage ethical behavior and honesty. Thus, no retaliation or adverse employment action will be taken directly or indirectly if you report in good faith a complaint or assist in an investigation of suspected unethical conduct, or any violation or potential violation of this Code.

Corrective Actions

Violation of this Code or any of EVERTEC's policies and procedures could compromise the Company's integrity and reputation, causing EVERTEC to be subject to criminal, civil and monetary penalties. EVERTEC will investigate any complaint received against its Service Providers, their performance, work and/or behavior inside or outside of our premises. EVERTEC will exercise corrective actions on Service Providers that do not comply with the requirements established in this Code. Depending on the severity of the situation the corrective action may include termination of EVERTEC's business relationship at its sole discretion. EVERTEC will pursue remedies against the Service Provider if their actions of non-compliance with this Code creates or potentially creates a loss to the Company.

Service Providers shall promptly take disciplinary actions on those employees found to be in violation of this Code, up to and including termination of contract and employment and report such actions to EVERTEC immediately after the violation is known. EVERTEC reserves its right to exercise additional action if deemed necessary. If any action in contravention of the provisions of this Code results in an investigation from authorities, the Service Provider has the obligation to cooperate with the investigation.

PROTECTION OF EVERTEC'S ASSETS

As an EVERTEC Service Provider, you must protect EVERTEC's tangible and intangible assets, as well as the assets of EVERTEC's customers, suppliers, business partners and distributors that are under your control or acting on your behalf. EVERTEC's assets may only be used for legitimate business purposes. Misappropriation of these assets is a breach of duty toward EVERTEC and may constitute an act punishable by law. Carelessness in managing EVERTEC's assets is also a breach of your responsibilities as an EVERTEC Service Provider.

To be able to monitor compliance with our rules and standards concerning the security and protection of both Company and individual property, searches of property owned or controlled by EVERTEC may be conducted at any time, including those used and/or in possession of any employee, agent, officer, director, consultant and independent contractor. The Company may also take the necessary steps to search employees, agents, officers, directors, consultants and independent contractors and their property within the premises owned, controlled or occupied by the Company.

Safeguarding EVERTEC's Intellectual Property

Intellectual property includes ideas, formulas, original works of authorship, trade secrets, trademarks, service marks, patents, inventions, software, source code, methods, designs, and techniques, regardless if they are registered for protection under any patent, trademark or copyright laws. We must respect intellectual property rights at all times. The unauthorized or illegal use of intellectual property may constitute an act punishable by law. Any violation or infringement of the rights of an intellectual property owner could expose EVERTEC or its Service Providers to litigation and monetary sanctions.

Service Providers recognize that any intellectual property made or developed during the contract of service with EVERTEC shall be the property of and inure to the exclusive benefit of EVERTEC. To assist EVERTEC in safeguarding its marks from misuse, Service Providers must obtain a written authorization from the Communications and Marketing Division prior to any use of EVERTEC's marks. If authorized, they have to affix such marks with the appropriate trademark, service mark or symbol. Questions regarding which symbol applies to a particular instance must be referred to the Legal and Compliance Division.

Privacy of Employee Information

Certain employee information may be private and confidential, and EVERTEC is committed to protect it. Confidential employee information may not be shared or discussed with any Service Provider, except if it is notified to the Director of the Legal and Compliance Division and authorized by the employee, or as required by applicable law or a subpoena or valid order issued by a court of competent jurisdiction or as requested by a judicial, administrative or legislative body. Under any other circumstances, the Director of the Legal and Compliance Division must approve requests for such records from anyone outside EVERTEC, including Service Providers.

Privacy and Security Obligations

While carrying out EVERTEC's business, you may often learn confidential or proprietary information about EVERTEC, its employees, customers, business partners and suppliers. It is very important that you understand your obligations and the impact that privacy and security of confidential information have on your organization as well as on EVERTEC. Foremost, your obligations will depend on the nature of the information that you have contact with while performing services on or for EVERTEC. If the information is of highly confidential or sensitive nature, as an EVERTEC Service Provider, you may be subject to contractual obligations that will require you to have in place a written security program for your employees and upstream and downstream entities to identify and report a suspected privacy or security breach or violation.

Safeguarding and using such information appropriately is a priority for EVERTEC. You must take appropriate steps to

safeguard confidential information in possession protecting it from disclosure, misuse, espionage, loss or theft. You have a duty to use this information only for the reasons for which it was provided, unless further use is required by law, regulations, legal proceedings, or authorized by the information owner. It's your responsibility to exercise particular care to protect at all times any confidential and proprietary information you obtain in connection with your activities at EVERTEC. This responsibility continues even after you have cease your association with EVERTEC and includes information you developed during the performance of the contracted duties.

Service Providers should contact an independent legal counsel to determine all required actions to be compliant related to privacy and security laws, rules, and regulations. As a general rule under the Security and Exchange Commission (SEC) Rules and Regulations, the Gramm-Leach Bliley Act, Regulation P as well as other privacy laws and regulations applicable to non-US jurisdictions, Service Providers should have:

- privacy and security policies that protect the privacy, confidentiality and integrity of customer information,
- safeguards in place to ensure that information is protected and not inappropriately used or disclosed,
- required confidentiality agreements,
- a privacy and security breach process that includes reporting, investigating, and tracking of incidents,
- a procedure for the required return/destruction of protected customer or confidential information upon termination of its agreement, and
- a procedure for restricting the marketing of protected customer information.

Service Providers with a signed service agreement or contract should review the provisions covering confidentiality and privacy obligations for additional information on the requirements that may apply, particularly those regarding the Service Provider's written security program. If required, EVERTEC may, at any time, request a copy of the aforementioned security program to ensure its adequacy and submit a certification to validate Service Providers' compliance with privacy and security rules.

EVERTEC's Privacy Policy details EVERTEC's commitment to customers and the processes that define, document, monitor and manage the security of information. It is vital that EVERTEC complies with all data privacy laws and regulations when they handle, acquire or develop confidential information about customers. Any fraudulent or improper use of this type of information by a Service Provider is strictly prohibited, as is any violation of EVERTEC's Privacy Policy. Violations to the aforementioned will be considered justification for termination of any relationship with EVERTEC.

Disclosure of Security Breach

In the event of any actual or suspected security breach involving unauthorized access to information that you learn of that either compromises or could compromise confidential information, including customer information, collectively a Security Breach (e.g., physical trespass on a secure facility, computing systems intrusion/hacking, loss/theft of a PC (laptop or desktop), loss/theft of printed materials, etc.), you must notify EVERTEC immediately as established in the *Speak Up on Ethical and Compliance Issues* section of this Code. Except as may be strictly required by applicable law, you agree that you will not inform any third party of any such security breach without EVERTEC's prior written consent. However, if such disclosure is required by applicable law, you agree to cooperate with EVERTEC regarding the content of such disclosure in order to minimize any potential adverse impact upon EVERTEC and its clients and customers and investigate reputational risks. Due to the nature of these issues, there is not an option to report them anonymously. The report should include: (1) the information breached, (2) individuals affected by the breach, (3) steps being taken to investigate the breach, (4) date of the breach and (5) date of discovery of the breach. You can send your report by email to informationsecurityincidentresponse@evertecinc.com or ethicsofficer@evertecinc.com; or through the EVERTEC

Ethics Line.

INVESTOR RELATIONS

Records and Reports

The records, data and information that EVERTEC owns, collects, uses and manages must be precise and complete. Service Providers are responsible for the integrity of those records or documents under their control. EVERTEC expects that financial reports be accurate and reliable in compliance with financial and accounting rules. When creating business records and other documents (including e-mails) that may be retained by EVERTEC or a third party, Service Providers must observe the business standards regarding content and language, taking into account that in the future, EVERTEC or a third party may have to rely on or interpret such records or documents.

Information to Financial Analysts

Service Providers are prohibited from providing EVERTEC's confidential and proprietary information to financial analysts outside the Company. As a public company EVERTEC has designated persons to speak in the name of the Company. The Service Provider shall refer the analyst to an EVERTEC's spokesperson.

Media, Publishing and Public Appearances

EVERTEC's ability to maintain a good reputation and image in the community is of utmost importance to its success as a business. To ensure that EVERTEC's reputation and image remain uncompromised, all inquiries from Service Providers that relate to EVERTEC, including EVERTEC's relationship with the Service Provider, must be referred to EVERTEC's Communications and Marketing Division. Only officially designated EVERTEC spokespersons may provide comments to the media or materials for publication.

At the outset, EVERTEC expects Service Providers to inform EVERTEC's Communications and Marketing Division of any positions the Service Provider may have taken in the past or are presently taking on issues which to their knowledge may be adverse, harmful, contradictory or otherwise prejudicial to the interests of EVERTEC. Service Providers should not make public appearances or statements on behalf of EVERTEC, or publish any material that relates to EVERTEC, without securing the Communications and Marketing Division's prior written approval. Service providers must notify and obtain approval from the Legal and Compliance Division and the Communications and Marketing Division before publishing any material in physical or electronic format (including on the internet and/or any form of multi-media and social networking sites, blogs, wikis, podcasts, forums, content communities, microblogs or any other form of social media), making speeches, giving interviews, appearing at depositions, hearings or making similar appearances in the capacity as an EVERTEC Service Provider, or responding to media inquiries (including blogs or any other Internet forum) that relate to EVERTEC, its operations, clients or employees.

When using social media in a personal capacity, Service Providers must comply with this Code, and with all corporate policies (including the confidentiality, non-disparagement and conflicts of interest provision contained herein), guidelines, applicable laws and regulations, including but not limited to copyright, confidentiality, privacy, fair use and financial disclosure laws. For security reasons EVERTEC Service Providers may not publish pictures of areas within EVERTEC's facilities that have been restricted to the general public.

Insider Trading

Service Providers may acquire during their services information that is sensitive and confidential. The information is

EVERTEC's property and Service Providers are prohibited from using this information directly or indirectly for trading in EVERTEC's securities. The use of information of other EVERTEC clients or suppliers for the purpose of trading their securities is also prohibited. Inside information may not be disclosed to others because it is information that is not publicly available and may affect the value of the securities. Misuse of nonpublic information is against U.S. securities laws.

SERVICE PROVIDERS' RESPONSIBILITIES

Confidential and Proprietary Information

EVERTEC generates and has access to highly confidential information from businesses, clients, employees, business partners, officers and directors which must be safeguarded to prevent inappropriate disclosure and unwarranted invasion of the rights to privacy of our customers, human resources and contracted entities. EVERTEC confidential and proprietary information includes, among other things: (1) internal business practices and records, (2) network, electronic, and media software and hardware, (3) intellectual property, (4) information concerning clients, providers, products, and pricing, (5) marketing and sales information, (6) EVERTEC customers and financial information, and (7) information about EVERTEC agreements and business relationships. This information is considered confidential regardless of the media on which it exists (electronic or paper form) or how it is stored, accessed or transmitted (electronic, physical or oral).

All confidential information belonging to EVERTEC must be retained in strictest confidence and not be disclosed to a third party, other than those employees or Service Providers having a need to know, and such recipients must certify to maintain the confidentiality of the information. Unauthorized disclosure of, or access to, confidential information may result in termination of a service contract and/or in civil and criminal penalties. Service Providers will be required to sign a non-disclosure and confidentiality agreement prior to the exchange of any EVERTEC confidential information, unless the Service Provider already has in place an agreement with EVERTEC that contains the appropriate provisions acceptable by EVERTEC regarding confidentiality obligations.

Fair Dealing

EVERTEC enjoys a history of success and an excellent reputation in the markets it operates due to its honest business practices. EVERTEC Service Providers must deal fairly with EVERTEC's clients, suppliers, business partners, contractors, competitors and employees, and may not take advantage of anyone or try to obtain competitive advantages through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair or illegal dealing practice.

Unless preferential treatment is available on the same terms, to similarly situated persons within the same business industry, and in similar situations or positions, directors, officers and employees should not receive preferential treatment from Service Providers without prior written approval from the manager of the business area in question and the Compliance and Ethics Officer.

Non-Disparagement

During the Service Provider/EVERTEC contractual relationship and at all times thereafter, neither the Service Provider nor their agents, executives or directors shall directly or indirectly issue or communicate any public statement, or statement likely to become public, that maligns, denigrates or disparages EVERTEC or its directors, executives, employees or clients. The foregoing shall not be violated by truthful responses to: (i) legal processes or governmental inquiries or (ii) by private statements to EVERTEC or any of EVERTEC's executives, directors or employees.

Acceptance of Clients and Suppliers

Service Providers may not accept other clients that may interfere or compromise their contractual responsibilities with EVERTEC's services. When dealing with other clients or suppliers Service Providers must evaluate that the relation will not develop a conflict of interest, corrupt actions or misuse of information or resources while handling the services and using their employees.

Substance Abuse

Service Providers will ensure that the employees assigned to handle tasks for EVERTEC, or those that will be working in the premises. EVERTEC prohibits that services be performed under the influence of drugs or alcohol. It is a violation of this Code that an employee of a Service Provider is under the influence of drugs or alcohol in EVERTEC's premises or while performing services for EVERTEC. EVERTEC can terminate a contract is found to be under the influence of drugs and alcohol while carrying out their duties.

LAWS AND REGULATIONS

Employment Practices and Workplace Conduct

EVERTEC is committed to providing equal employment opportunities and complying with the full range of fair employment practices and non-discrimination laws, and expect its Service Providers to do the same. EVERTEC values and respects diversity. EVERTEC will not tolerate discrimination, harassment or intimidation, by or against our directors, officers, employees, supervisors, workers, customers, other service providers, business partners or visitors, whether while visiting our premises or during the course of performing services for EVERTEC. EVERTEC expects its Service Providers to also maintain zero tolerance policies against such discrimination and harassment. Violation of EVERTEC's zero tolerance policy may result in the immediate termination of any contract, as well as civil and criminal penalties.

Whistle Blowing

A whistleblower is a person who voluntarily provides information to the general public, or someone in a position of authority, about dishonest or illegal business activities occurring at an organization. This organization could include a government department, a private organization, or a public company such as EVERTEC. EVERTEC has established procedures for confidential and anonymous submission, receipt, retention and treatment of complaints regarding accounting, internal accounting controls and any auditing matters, as well as suspicious, fraudulent or illegal acts, mismanagement of funds, compliance or ethics violations, and employee-related matters. If Service Providers have a complaint or concern regarding any of these matters, promptly follow the reporting methods established in this Code. EVERTEC prohibits all forms of retaliation on Service Providers who in good faith raise complaints regarding the above mentioned matters.

Anti-Money Laundering and Counterterrorism Financing Policy

EVERTEC is committed to assisting governments, international organizations and other members of the financial services industry in the struggle to close the channels used by money launderers. Service Providers may not engage in money laundering or finance terrorist activities, and are expected to have their own programs to prevent and detect such activities and to shield EVERTEC from being used as a money laundering conduit. No business opportunity is worth compromising the commitment to combat money laundering.

Service Providers must follow all Anti-Money Laundering and Office of Foreign Asset Control (OFAC) laws and regulations applicable to their businesses or the jurisdictions in which they do business. Failure to comply with this requirement may result

in not only the termination of their relationship with EVERTEC, but also in civil and criminal sanctions. Any questions regarding EVERTEC's anti-money laundering efforts or unusual activity detection regarding money laundering or terrorism financing must be addressed to EVERTEC's Compliance Office or reported through the reporting methods established in this Code.

Anti-Bribery and Anti-Corruption

As a U.S. company with international activities and investments, EVERTEC is required to comply with the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. Both laws impose certain obligations on companies that, like EVERTEC, are publicly-traded and therefore registered with the SEC. FCPA prohibits bribery or corrupt payments to a foreign official to obtain or retain business, whether such bribery or corrupt payment is made directly or indirectly. In addition, FCPA requires that publicly listed companies maintain records that fairly and accurately reflect the transactions of the Company as well as maintain an adequate system of internal accounting control systems that assure management's control over the Company's assets.

The UK Bribery Act is another anticorruption law, which prohibits bribery within the public and private sector. In the private sector it makes it illegal to offer or give anything of value, either directly or through an intermediary, to induce the recipient or some other person to violate his or her duty of loyalty to his or her employer, or to provide the recipient with an improper advantage in connection with his or her position. The UK Bribery Act also establishes that it is illegal to request anything of value in violation of a duty of loyalty to one's employer or to receive an improper advantage in connection with one's position. In the public sector, it makes illegal to bribe public officials. Bribery occurs when promising, offering, giving or authorizing the offering or giving of money, or anything of value, to a public official, either directly or through an intermediary, to secure an improper advantage. Anticorruption laws applicable to EVERTEC prohibit more than monetary payments, for they also forbid the acceptance or giving of anything of value to a public official or a close family member of the public official.

EVERTEC expects its Service Providers to comply with the FCPA, as well as with all the anti-bribery and anti-corruption laws applicable in the countries where EVERTEC and the Service Provider conduct business. Service Providers are expected to have policies and procedures in place to affirm the integrity of their organizations' information. If asked, Service Providers have an obligation to provide accurate and complete information to EVERTEC auditors about the status of financial, operational, and compliance risks and controls related to their business with EVERTEC. Service Providers who believe they have been asked to withhold information from auditors should immediately report their concern at <http://www.evertecthicsline.com>. Service Providers are responsible for submitting truthful, complete and accurate data, and are required to appropriately document services in their reports.

These expectations require from all Service Providers to warrant and represent to the Company that neither they nor any of its officers, directors, employees, agents or other representatives has performed or will perform any of the following acts in connection with their business relationship with EVERTEC:

- (i) pay, offer or promise to pay, or authorize the payment of, any money; **or**
- (ii) give or promise to give, or authorize the giving of, any services or anything else of value, either directly or through a third party, to any official or employee of any governmental authority or instrumentality, or of a public international organization, or of any agency or subdivision thereof, or to any political party or official thereof or to any candidate for political office for the purpose of any of the following:

- a. influencing any act or decision of that person in his official capacity, including a decision to fail to perform his official functions with such governmental agency or instrumentality or such public international organization or such political party;
- b. inducing such person to use his influence with such governmental agency or instrumentality or such public international organization or such political party to affect or influence any act or decision; **or**
- c. securing any improper advantage.

The consequences of a Service Provider failing to comply with any of the previous acts regarding the FCPA, may include the following:

- (i) the agreement between EVERTEC and the Service Provider shall become void;
- (ii) EVERTEC shall have a right of action against the Service Provider for the amount of any monetary payment or thing of value made or given by the Service Provider in breach of any of such covenants;
- (iii) all obligations by EVERTEC to pay any fee or other compensation to the Service Provider shall cease immediately; and

Also, the FCPA has specific criminal and civil penalties for violations involving what may be considered bribery of any of the aforementioned persons or entities. These penalties include, but are not limited to fines for the Company as well as fines and imprisonment for individuals convicted of such conduct.

Service Providers who intend to interact or conduct business transactions with foreign entities on EVERTEC's behalf must never do so without obtaining written authorization to do so and instruction from EVERTEC's Legal and Compliance Division regarding the Anti-Bribery and Anti-Corruption Program.

Export and Import Regulations

In performing the obligations under contracts with EVERTEC, Service Providers shall comply with the export control regulations and other applicable laws related to the export of goods, software, technology or technical data or services. In case of exports, Service Providers acknowledge that they have obtained all the authorizations required by the laws or regulations for selling and exporting their products, where applicable. No exports or re-exports will be made without authorization to any country that is subject to an embargo or other trade sanctions by the U.S. Also, no exports or re-exports will take place with any person or organization on the various lists of restricted parties maintained by the U.S. Government, including the Entity List, Treasury Department Specially Designated Nationals and Blocked Persons List, Unverified List and the Denied Persons List, or any other list that the U.S. Department of the Treasury or U.S. Department of Commerce may identify from time to time

Conflict of Minerals

Service Providers that are required by the Dodd-Frank Wall Street Reform and Consumer Protection Act to disclose whether conflict minerals in their products are conflict free, shall disclose to EVERTEC any conflict minerals used in the production of any product subject to EVERTEC's contracts. We expect that our Service Providers who manufacture components, parts, or products containing tin, tantalum, tungsten and/or gold must commit to acquiring those materials from sources that are in compliance with the conflict minerals rule. Service Provider shall exercise due diligence, as established by law, to determine

whether those materials are from the Democratic Republic of the Congo or adjoining countries and determine whether those materials finance or benefit armed groups or groups that are against human rights.

Antitrust Laws

State and Federal Antitrust laws prohibit monopolistic conduct and agreements that restrain trade. EVERTEC is committed to competition and consumer choice in the marketplace. Trade practices that unfairly or unreasonably restrain competition in dealings with customers must also be avoided. Service Providers must adhere to the antitrust laws, including but not limited to the Sherman Act, the Clayton Act, the Federal Trade Commission Act, the Puerto Rico Antitrust Act and any foreign laws (if applicable to the business jurisdiction). Antitrust regulations establish that EVERTEC and EVERTEC Service Providers must avoid any agreement or understanding with competitors on price, customers, markets, or other terms of dealing. For example, in order to avoid the impression that EVERTEC is fixing rates, antitrust laws prohibit any director, officer or employee of EVERTEC to disclose to any Service Provider the amount EVERTEC pays to another Service Provider, nor any detail about the engagement with another service provider.

INELIGIBLE SERVICE PROVIDERS

The U.S. government imposes economic sanctions on other nations, entities or individuals for national security or foreign policy reasons. EVERTEC is a company that operates in U.S. jurisdictions, and is consequently subject to federal government requirements. As such, EVERTEC is prohibited from engaging in certain business transactions or contracting with Service Providers involving embargoed countries and designated persons or entities. EVERTEC will deny its services, refuse to engage in new commercial relationships, reject transactions, block assets or terminate a relationship, if the Service Provider or any of its directors, officers, employees and upstream or downstream entities, have been, are or become:

- Identified and listed on any of the following lists:
 - (1) Specially Designated Nationals and Blocked Persons List,
 - (2) Specially Designated Terrorist,
 - (3) Specially Designated Narcotic Traffickers, and
 - (4) Specially Designated Global Terrorist.

Service Providers as well as their representatives are screened against these exclusion lists upon initial engagement of the Service Provider by EVERTEC and these are reviewed periodically when the list is amended by the applicable U.S. government entity.

CLOSING THOUGHTS

EVERTEC has always been recognized by its great professionalism and excellent reputation. Integrity, honesty and good faith are the values that describe the essence of EVERTEC's professional conduct and serve as the foundation for the execution of its business practices and the strengthening of clients' trust. This Code reaffirms this commitment. Each Service Provider must represent the high levels of ethics, integrity and morality that define EVERTEC's corporate culture. Service Providers must assure that their actions and performance always reaffirm their commitment to this Code. This Code replaces any Code of Ethics previously adopted for Service Providers, but adherence to this Code is required to the same extent as previously agreed.

As an EVERTEC Service Provider, you have greatly contributed to making EVERTEC an institution worthy of our customers'

and employees' trust.

Contact Information

Compliance and Ethics Officer (787) 759-9999 ext.4808, ethicsofficer@evertecinc.com

Legal and Compliance Division (787) 759-9999 ext. 4806

Code of Ethics for Vendors and Service Providers <http://www.evertecinc.com>

EVERTEC Ethics Line <http://www.evertecethicsline.com>

Information Security informationsecurityincidentresponse@evertecinc.com