



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

January 18, 2024

Danielle Scalzo
Willkie Farr & Gallagher LLP

Re: Fidelity National Information Services, Inc. (the "Company")
Incoming letter dated January 17, 2024

Dear Danielle Scalzo:

This letter is in regard to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by Inspire Investing, LLC (the "Proponent") for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders. Your letter indicates that the Proponent has withdrawn the Proposal and that the Company therefore withdraws its January 10, 2024 request for a no-action letter from the Division. Because the matter is now moot, we will have no further comment.

Copies of all of the correspondence related to this matter will be made available on our website at <https://www.sec.gov/corpfin/2023-2024-shareholder-proposals-no-action>.

Sincerely,

Rule 14a-8 Review Team

cc: Robert Netzly
Inspire Investing, LLC

January 10, 2024

VIA E-MAIL

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, DC 20549
shareholderproposals@sec.gov

RE: Fidelity National Information Services, Inc.
Request to Exclude Shareholder Proposal of Inspire Investing LLC

Ladies and Gentlemen:

This letter is submitted pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the “Exchange Act”), on behalf of Fidelity National Information Services, Inc., a Georgia corporation (the “Company”). On behalf of the Company, we hereby advise the staff of the Division of Corporation Finance (the “Staff”) of the Securities and Exchange Commission (the “Commission”) of the Company’s intention to exclude the shareholder proposal (the “Proposal”) and supporting statement (the “Supporting Statement”) submitted by Inspire Investing LLC (the “Proponent”) from the Company’s proxy statement and form of proxy for the Company’s 2024 annual meeting of shareholders (together, the “2024 Proxy Materials”). The full text of the Proposal and the Supporting Statement is attached hereto as Exhibit A.

The Company respectfully requests confirmation that the Staff will not recommend enforcement action to the Commission if the Company excludes the Proposal under Rule 14a-8(e)(2) and Rule 14a-8(f), on the basis that the Proposal was not received at the Company’s principal executive offices by the properly determined deadline. In addition, the Proposal is excludable under Rule 14a-8(b)(1)(iii) on the basis that the Proposal did not include the business days and specific times during the Company’s regular business hours that the Proponent was available to discuss the Proposal with the Company.

In accordance with SEC Staff Legal Bulletin No. 14 (July 13, 2001) (“SLB 14”), we are submitting this letter, including the exhibits thereto, electronically to the Staff at shareholderproposals@sec.gov. Pursuant to Rule 14a-8(j), we are simultaneously sending a copy of this letter and its attachments to the Proponent as notice of the Company’s intention to exclude the Proposal from the 2024 Proxy Materials. This letter is being submitted on the Company’s behalf not less than 80 calendar days before the Company expects to file its definitive 2024 Proxy Materials in accordance with Rule 14a-8(j).

Rule 14a-8(k) and SEC Staff Legal Bulletin No. 14D (November 7, 2008) provide that shareholder proponents are required to send companies a copy of any correspondence that the shareholder proponents elect to submit to the Commission or the Staff. Accordingly, we hereby remind the Proponent that if the Proponent submits correspondence to the Commission or the Staff with respect to the Proposal, a copy of such correspondence should concurrently be submitted to the Company.

I. PROPOSAL

The text of the resolution included in the Proposal reads as follows:

Shareholders request the Board of Directors of Fidelity National Information Services conduct an evaluation and issue a report within the next year, at reasonable cost and excluding proprietary information and disclosure of anything that would constitute an admission of pending litigation, evaluating how it oversees risks related to discrimination against individuals based on their race, color, religion (including religious views), sex, national origin or political views, and whether such discrimination may impact individuals' exercise of their constitutionally protected civil rights.

II. BASIS FOR EXCLUSION

The Company respectfully believes the Proposal may be properly excluded from the 2024 Proxy Materials pursuant to Rule 14a-8(e)(2) and Rule 14a-8(f), because the Proposal was not sent to the Company's principal executive offices by the properly determined deadline, which the Proponent has acknowledged. In addition, the Proposal is excludable under Rule 14a-8(b)(1)(iii) because the Proposal did not include the business days and specific times during the Company's regular business hours that the Proponent was available to discuss the Proposal with the Company.

III. BACKGROUND

The Proposal, dated December 5, 2023, was sent by the Proponent via UPS to the Company at 601 Riverside Avenue, Jacksonville, Florida 32204. According to the UPS tracking number, it was received at that address on December 6, 2023. A Company employee has confirmed receipt of the Proposal at such address. The Company's principal executive offices are 347 Riverside Avenue, Jacksonville, Florida 32202. This address was clearly stated in the Company's 2023 proxy statement (the "2023 Proxy Statement") as the address to which any shareholder proposal under Rule 14a-8 should be sent. The deadline for any such proposal, as clearly stated in the Company's 2023 proxy statement, was December 16, 2023 (the "Deadline"). Thus, the Proposal was not sent to the Company's principal executive offices by the Company's properly determined deadline (the "Untimely Submission").

In addition, the cover letter accompanying the Proposal stated that (1) the Proponent would make available a proof of ownership letter from the Proponent's custodian upon receipt of an email address to which to send it (the "Proof of Ownership Deficiency") and (2) the Shareholder would

“make [itself] available to speak to the company about [the] proposal as needed” (the “Engagement Deficiency”).

The Company resolved the Proof of Ownership Deficiency on its own by verifying that the Proponent’s name appears in the Company’s records as a shareholder, leaving the Untimely Submission and the Engagement Deficiency.

Under Rule 14a-8(f), a company is not required to send a notice of deficiency if the deficiency cannot be remedied, “such as if [a shareholder] fail[s] to submit a proposal by the company’s properly determined deadline.” Although the Company was not required to do so, on December 19, 2023, the Company sent the Proponent a letter via email and FedEx (the “Deficiency Letter”) notifying the Proponent that the Proponent had failed to deliver the Proposal to the Company’s principal executive offices by the Deadline. The Deficiency Letter also notified the Proponent of the Engagement Deficiency, stating, however, that, even if the Proponent adequately corrected it within 14 calendar days of the Proponent’s receipt of the Deficiency Letter as permitted under Rule 14a-8(f), the Company believed the Proposal would still be ineligible given the Untimely Submission. *See* Exhibit B.

The Company received an email response to the Deficiency Letter on December 20, 2023 (the “Proponent Email Response”). *See* Exhibit C. In the Proponent Email Response, the Proponent acknowledged that the Proponent used an outdated company address from *Bloomberg* and that the Proponent should not have relied on that. The Proponent also acknowledged that the Untimely Submission was not curable and that the Company was entitled to exclude the Proposal from the 2024 Proxy Materials on the basis of the Untimely Submission. The Proponent indicated it intended to submit the Proposal again next year. The Proponent did not address the Engagement Deficiency.

As of the date of this letter, the Company has not received any further correspondence from the Proponent.

IV. ANALYSIS

A. The Proposal may be excluded pursuant to Rule 14a-8(e)(2) because the Proposal was not sent to the Company’s principal executive offices prior to the deadline for submitting shareholder proposals for inclusion in the 2024 Proxy Materials.

The Company respectfully requests that the Staff concur with its view that the Proposal may be excluded from the 2024 Proxy Materials pursuant to Rule 14a-8(e)(2) because the Proposal was not sent to the Proponent at its principal executive offices before the December 16, 2023 deadline for submitting shareholder proposals to the Company.

The Proponent was on notice of where to send the Proposal but did not follow the clear instructions in the 2023 Proxy Statement for submission of shareholder proposals. The Company’s 2023 Proxy Statement complies with the rules promulgated under Regulation 14A and the Staff

guidance set forth in SLB 14 and Staff Legal Bulletin 14C (June 28, 2005). Specifically, in accordance with Rule 14a-5(e) of the Exchange Act and Schedule 14A, the Company clearly disclosed in the 2023 Proxy Statement the deadline and instructions for delivery of stockholder proposals for its 2024 Annual Meeting of Stockholders:

“Any other proposal that a shareholder wishes to be considered for inclusion in the proxy and proxy statement relating to the Annual Meeting of Shareholders to be held in 2024 pursuant to Rule 14a-8 must be received by the Company no later than December 16, 2023... All proposals must be directed to our Corporate Secretary of the Company at 347 Riverside Avenue, Jacksonville, Florida 32202.”

SLB 14, Item C3(c) is clear that shareholders are to find the address of a company’s principal executive offices in the company’s proxy statement. Despite the clear instructions in the 2023 proxy statement, the Proponent did not send the Proposal to the Corporate Secretary of the Company at the address stated above, but rather to 601 Riverside Avenue, Jacksonville, Florida 32202 (the Company’s former headquarters). According to the Proponent Email Response, the Proponent did so on the basis of an incorrect address published on *Bloomberg*, a website completely unaffiliated with the Company and for which the Company bears no responsibility. The Proponent made no attempt to confirm the correct address with the Company or to confirm receipt of the Proposal. Whether the Proponent made a good faith attempt to submit a proposal to the company’s principal executive offices by the deadline does not excuse the failure to comply with the delivery requirements, and a Proponent cannot avoid exclusion by explaining that it used an incorrect address.

In fact, SLB 14, Item C3(c) explicitly states that “if a shareholder sends a proposal to any other location, even if it is to an agent of the company or *to another company location*, this would not satisfy the requirement” of Rule 14a-8(e)(2) (emphasis added). *See, e.g., The Coca Cola Company* (January 11, 2001) (proposal was excludable when proponent emailed it to the company’s transfer agent’s address listed on its website).

The Staff has previously permitted companies to exclude proposals where the proposal, as in the case at hand, has been transmitted to locations or departments of a company other than the Company’s principal executive offices. In *Nabors Industries Ltd.* (April 15, 2003), the Staff concurred with exclusion of a proposal when the proponent admitted it delivered its proposal to the address of one of the company’s subsidiaries when the address of the principal executive offices was unambiguously set forth in the company’s SEC filings. Similarly, in *Verizon Communications Inc.* (Jan. 29, 2008), the Staff concurred that a proposal was excludable when the proponent delivered the stockholder proposal to an incorrect company address, which the no-action request stated had “not been [the company’s] principal executive offices for several years.” *See also Hess Corporation* (March 19, 2012) (proposal was excludable when proposal was emailed and faxed to a location other than the company’s principal executive offices); *Alcoa Inc.* (avail. Jan 12, 2009) (proposal was excludable when transmitted via email to the company’s investor

relations department); *Xerox Corporation* (May 2, 2005) (proposal was excludable when faxed to a machine in Xerox's treasury department which was located on a different floor within Xerox's large office building); *Intel Corporation* (March 5, 2004) (proposal was excludable because proponent sent it to the company's engineering department not its principal executive offices); *The DIRECTV Group, Inc.* (March 23, 2005) (proposal was excludable because it was sent to the communications department, not the company's principal executive offices).

Accordingly, the Proposal is properly excludable from the 2024 Proxy Materials because it was not sent to the Company's principal executive offices by the Deadline as required under Rule 14a-8(e)(2) and SLB 14.

B. Additionally, the Proposal may be excluded under Rule 14a-8(b) and Rule 14a-8(f)(1) because the Proponent failed to provide the Company with an adequate written statement regarding its ability to meet with the Company.

Under Rule 14a-8(b)(1)(iii), a proponent must provide the company with a written statement that the proponent is able to meet with the company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the stockholder proposal. This written statement must include "business days and specific times" during the company's regular business hours, that the proponent is available to discuss with the company. Rule 14a-8(f)(1) permits a company to exclude a stockholder proposal from the company's proxy materials if the proponent fails to comply with the eligibility or procedural requirements under Rule 14a-8, provided that the Company has timely notified the proponent of the deficiency, and the proponent has failed to correct such deficiency within 14 calendar days of receipt of such notice.

The Staff has usually not recommended enforcement action when a company omits a shareholder proposal from its proxy materials in reliance on Rule 14a-8(b)(1)(iii) and 14a-8(f), when proponents have failed, following notice by the company, to provide a statement, including specific dates and times, regarding the proponent's availability to meet with the company. *See, e.g., Textron Inc.* (January 23, 2023) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's availability to meet with the company after receiving the company's timely deficiency notice); *Molina Healthcare, Inc.* (January 17, 2023) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's availability to meet with the company after receiving the company's timely deficiency notice); *Deere & Company* (December 5, 2022) (permitting exclusion of a proposal under Rule 14a-8(f)(1) where the proponent failed to provide a statement regarding the proponent's availability to meet with the company that was compliant with Rule 14a-8(b)(1)(iii) after receiving the company's timely deficiency notice).

The Commission, when adopting Rule 14a-8(b)(1)(iii), stated that a proponent's general statement of availability does not comply with Rule 14a-8(b)(1)(iii). *See* 2020 Adopting Release. The Staff has consistently concurred with the exclusion of proposals when proponents have

provided a general statement regarding the proponent's availability to meet with the company. For example, in *Visa* (September 13, 2023), the Staff concurred with exclusion of a proposal when the proponent's representative did not state the specific dates and times within the required range under Rule 14a-8(b)(iii) and only provided a blanket statement of availability that tracked the full range of dates required under the rule. Similarly, in *Rite Aid Corp.* (April 12, 2023), the Staff concurred with exclusion of a proposal when, in response to a timely deficiency notice, the proponent's representative indicated that "[the proponent] is willing to meet with [the company]." See also *Molina Healthcare, Inc.* (January 17, 2023) (concurring with the exclusion of a proposal under Rule 14a-8(f) where the proponent indicated generally that "[w]e would be pleased to discuss the issues presented by this proposal with you," and failed to correct this and other procedural deficiencies identified in a timely deficiency notice).

Similarly, here the Proponent did not include with the Proposal a written statement containing specific dates and times regarding the Proponent's availability to meet with the Company to discuss the Proposal. Instead, the Proponent provided a blanket statement of availability that it would "make [itself] available to speak to the company about [the] proposal as needed." See Exhibit D. The Company sent the Proponent the Deficiency Letter, notifying the Proponent of this deficiency and how to correct it, specifically stating that Rule 14a-b(iii) requires that the Proponent "provide the Company with a written statement that you are able to meet with the Company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the proposal" and that the Proponent "must include the business days and specific times during the Company's regular business hours that you are available to discuss the Proposal with the Company." The Deficiency Letter was sent to the Proponent on December 19, 2023 by email and overnight mail as requested by the Proponent. The Company did not receive the required written statement from the Proponent to correct the deficiency within the 14 days permitted under 14a-8(f)(1), and, thus, the Proponent has not corrected the Engagement Deficiency.

For the foregoing reasons, the Company respectfully requests that the Staff concur in the Company's view that the Company may exclude the Proposal from its 2024 Proxy Materials pursuant to Rule 14a-8(b)(1) and Rule 14a-8(f)(1) as the Proponent has failed to provide a written statement of ability to meet with the Company to discuss the Proposal.

V. Conclusion

For the above-mentioned reasons, the Company respectfully requests that the Staff concur in the Company's view that the Company may exclude the Proposal from its 2024 Proxy Materials, and that the Staff will not recommend enforcement action to the Commission if the Company excludes the Proposal.

If the Staff has any questions with respect to the foregoing, or for any reason the Staff does not agree that the Company may exclude the Proposal from its 2024 Proxy Materials, please do not hesitate to contact me at Danielle Scalzo at dscalzo@willkie.com or 212-728-8620.

Sincerely,

A handwritten signature in cursive script that reads "Danielle Scalzo".

Danielle Scalzo

Enclosures

Cc: Caroline Tsai, Fidelity National Information Services, Inc.

EXHIBIT A

(see attached)

Report on Risks of Politicized De-banking

Supporting Statement:

Financial institutions are essential pillars of the marketplace. On account of their unique and pivotal role in America's economy, many federal and state laws already prohibit them from discriminating against customers. And the UN Declaration of Human Rights recognizes that "everyone has the right to freedom of thought, conscience, and religion."¹ These are an important part of protecting every American's right to free speech and free exercise of religion.

As shareholders of Fidelity National Information Services, we believe it is essential for the company to provide financial services on an equal basis without regard to factors such as race, color, religion, sex, national origin, or social, political, or religious views.

We are concerned with recent evidence of religious and political discrimination against customers by companies in the financial services industry, as seen in recent examples² and the 2022 Statement on Debanking and Free Speech.³

The 2023 edition of the Viewpoint Diversity Business Index⁴ shows that many of the largest financial institutions include vague and subjective grounds to deny service like "reputational risk," "social risk," "misinformation," "hate speech" or "intolerance." These kinds of terms allow financial institutions to deny or restrict service for arbitrary or discriminatory reasons. They also give fringe activists and governments a foothold to demand that private financial institutions deny service under the sweeping, unfettered discretion that such policies provide.

When companies engage in this kind of discrimination, they hinder the ability of Americans to access the marketplace and instead become *de facto* regulators and censors. This undermines the fundamental freedoms of our country and is an affront to the public trust. Politicized debanking can also damage the company's reputation and ability to operate in favorable regulatory environments.

¹ <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

² <https://adflegal.org/press-release/bank-america-boots-charity-serving-impooverished-ugandans-under-vague-risk-tolerance>; <https://www.newsweek.com/stop-troubling-trend-politically-motivated-debanking-opinion-1787639>; <https://www.dailymail.co.uk/news/article-12314423/The-Coutts-Farage-dossier-bank-admitted-ex-Ukip-leader-DID-meet-commercial-criteria-used-tweet-Ricky-Gervais-trans-joke-Novak-Djokovic-ties-decide-odds-position-inclusive-organisation.html>; <https://familycouncil.org/?p=25159>

³ https://storage.googleapis.com/vds_storage/document/Statement%20on%20Debanking%20and%20Free%20Speech.pdf.

⁴ <https://viewpointdiversityscore.org/business-index>

In early 2023, shareholders called for Chase, Mastercard, PayPal, Capital One, and Charles Schwab to assess whether they have adequate safeguards to prevent politicized de-banking.⁵ Nineteen state attorneys general and fourteen state financial officers specifically called out Chase for their de-banking of a non-profit committed to advancing religious freedom and demanded action from the company to show good faith in addressing these widespread concerns.⁶

Resolved: Shareholders request the Board of Directors of Fidelity National Information Services conduct an evaluation and issue a report within the next year, at reasonable cost and excluding proprietary information and disclosure of anything that would constitute an admission of pending litigation, evaluating how it oversees risks related to discrimination against individuals based on their race, color, religion (including religious views), sex, national origin, or political views, and whether such discrimination may impact individuals' exercise of their constitutionally protected civil rights.

⁵ <https://www.jpmorganchase.com/content/dam/jpmc/jpmorgan-chase-and-co/investor-relations/documents/proxy-statement2023.pdf> pg. 100-101; https://s201.q4cdn.com/231198771/files/doc_financials/2023/ar/PayPal-Holdings-Inc-Combined-2023-Proxy-Statement-and-2022-Annual-Report.pdf pg. 105-106; <https://ir-capitalone.gcs-web.com/static-files/8de8dcce-b518-491d-bd78-b01a8a66028c> page 149 – 153; https://content.schwab.com/web/retail/public/about-schwab/Charles_Schwab_2023_Proxy.pdf pg. 83-85.

⁶<https://www.wsj.com/articles/jpmorgan-targeted-by-republican-states-over-accusations-of-religious-bias-903c8b26>

EXHIBIT B
(see attached)



347 Riverside Avenue, Jacksonville, FL 32202
Tel. 877.482.8786 | Fax. 904.357.1105 | fisglobal.com

December 19, 2023

VIA OVERNIGHT MAIL AND EMAIL

Robert Netzly
Chief Executive Officer
Tim Schwarzenberger
Director of Shareholder Engagement
Inspire Investing, LLC
3597 E. Monarch Sky Lane, Suite 330
Meridian, Idaho 83646
engagement@inspireinvesting.com

Re: Notice of Deficiencies

Dear Mr. Netzly and Mr. Schwarzenberger:

Reference is made to your letter dated December 5, 2023 purporting to submit a shareholder proposal and supporting statement relating to a “Report on Risks of Politicized De-Banking” (the “**Proposal**”) for inclusion in the 2024 proxy statement of Fidelity National Information Services, Inc. (the “**Company**”).

We write to inform you that in accordance with Rule 14a-8 of the Securities Exchange Act of 1934, as amended (“**Rule 14a-8**”), regarding the inclusion of shareholder proposals in a company’s proxy statement, you have failed to satisfy the following eligibility and procedural requirements:

1. Engagement Availability

Rule 14a-8(b)(1)(iii) requires you provide the Company with a written statement that you are able to meet with the Company in person or via teleconference no less than 10 calendar days, nor more than 30 calendar days, after submission of the Proposal. You must include the business days and specific times during the Company’s regular business hours that you are available to discuss the Proposal with the Company.

2. Untimely Submission of the Proposal

You did not deliver the Proposal to the Company’s principal executive offices at 347 Riverside Avenue, Jacksonville, Florida 32202 by the submission deadline. Rule 14a-8(e)(2) requires that a shareholder proposal must be received at the Company’s principal executive offices not less than 120 calendar days before the date of the Company’s proxy statement released to shareholders in connection with the previous year’s annual meeting. That deadline was December 16, 2023. Both the deadline and proper address can be found in the Company’s 2023 proxy statement. Under Staff Legal Bulletin No. 14, Item C3(c), if a shareholder sends a proposal to any other location, even if it is to another company location, this would not satisfy the requirement. Under Rule 14a-8(f), a failure to submit a proposal to the Company’s principal executive offices by the properly determined deadline cannot be remedied.



347 Riverside Avenue, Jacksonville, FL 32202
Tel. 877.482.8786 | Fax. 904.357.1105 | fisglobal.com

Therefore, even if you adequately corrected the engagement availability deficiency noted above within 14 calendar days of your receipt of this letter under Rule 14a-8(f), the Proposal is ineligible given the untimely submission.

We intend to exclude the Proposal from the Company's 2024 proxy materials for these reasons. We will simultaneously provide you with a copy of our submission to the Securities and Exchange Commission.

If you have any questions with respect to the foregoing, please contact me at chip.keller@fisglobal.com. For your reference, I enclose a copy of Rule 14a-8 and Staff Legal Bulletin No. 14.

Sincerely,

A handwritten signature in blue ink that reads "Charles H. Keller". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Charles H. Keller
Corporate Secretary

Enclosures

EXHIBIT C

(see attached)

From: [Tim Schwarzenberger](#)
To: [Keller, Chip](#); [Inspire Engagement](#)
Cc: [Roeva, Elena](#); [Blinkhorn, Andrea](#); [Robert Netzly](#); [Darrell Jayroe](#)
Subject: RE: Letter Regarding Fidelity National Information Services, Inc. Shareholder Proposal
Date: Wednesday, December 20, 2023 11:18:14 AM
Attachments: [image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Letter Regarding Fidelity National Information Services, Inc. Shareholder Proposal.pdf](#)

Hi Chip:

This is unfortunate news. If you are going to exclude the proposal based on something so minor, you can certainly do that. Unfortunately, Bloomberg still lists your address as 601 Riverside Avenue, and we should not have relied on that. I suspect the proposal was still received by you, but you all decided to go this route and send a response just a couple of days after the deadline so there would be no chance of us resubmitting.

We will be filing again next year. I think it would be in everyone's interest to avoid that by simply completing the Viewpoint Diversity Survey as we discussed with Ms. Andrea Blinkhorn (copied) recently. As mentioned to Ms. Blinkhorn, we can appreciate that you all have a lot on your plate now; however, this is very important to us as shareholders, and we are willing to be flexible to accommodate your busy schedule and give you more time to complete the survey. We were so thankful for all of your efforts last year. FIS received the highest score of any company in the business index.

<https://www.viewpointdiversityscore.org/business-index> We were hoping to build upon that progress this year.

Tim Schwarzenberger, CFA
Portfolio Manager, Director of Corporate Engagement



www.inspireinvesting.com

Toll Free: 877.658.9473 x156

Direct: 208.994.0652

National Headquarters: 3597 E Monarch Sky Ln, Suite 330, Meridian, ID 83646

Advisory services are offered through Inspire Investing, LLC, a Registered Investment Adviser with the SEC.

From: Parillo, Terra <Terra.Parillo@fisglobal.com> **On Behalf Of** Keller, Chip
Sent: Tuesday, December 19, 2023 12:17 PM
To: Inspire Engagement <engagement@inspireinvesting.com>
Cc: Roeva, Elena <Elena.Roeva@fisglobal.com>
Subject: Letter Regarding Fidelity National Information Services, Inc. Shareholder Proposal

Dear Mr. Netzly and Mr. Schwarzenberger:

Reference is made to your letter dated December 5, 2023 purporting to submit a shareholder proposal and supporting statement relating to a “Report on Risks of Politicized De-Banking” for inclusion in the 2024 proxy statement of Fidelity National Information Services, Inc. Please see attached response to your December 5, 2023 letter.

Please contact me if you have any questions.

Thank you,

Chip Keller

SVP, Deputy General Counsel and Corporate Secretary
Fidelity National Information Services, Inc.

Direct: 904.718.0483

E: Chip.Keller@fisglobal.com

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EXHIBIT D
(see attached)

Via UPS

December 5, 2023

Fidelity National Information Services
Attn: Secretary of the Company
601 Riverside Avenue
Jacksonville, Florida 32204

To whom it may concern,

I hereby submit the enclosed shareholder proposal (“Proposal”) for inclusion in the Fidelity National Information Services (the “Company”) proxy statement to be circulated to Company shareholders in conjunction with the next annual meeting of shareholders. The Proposal is submitted under Rule 14(a)-8 (Proposals of Security Holders) of the United States Securities and Exchange Commission’s proxy regulations.

I submit the Proposal as the Founder & Managing Member of Inspire Investing, LLC, which has continuously owned Company stock with a value exceeding \$25,000 for at least 1 year prior to and including the date of this Proposal and which intends to hold these shares through the date of the Company’s 2024 annual meeting of shareholders. A Proof of Ownership letter from our custodian, BBH, will be made available. Please let us know to whom it can be emailed.

Copies of correspondence or a request for a “no-action” letter should be sent to me and Tim Schwarzenberger at Inspire Investing, 3597 E. Monarch Sky Lane, Suite 330, Meridian, Idaho 83646 and emailed to engagement@inspireinvesting.com. We will make ourselves available to speak to the company about this proposal as needed.

Sincerely,

Robert Netzly

Robert Netzly
Chief Executive Officer

Tim Schwarzenberger

Tim Schwarzenberger, CFA
Director of Shareholder Engagement

Enclosure: Shareholder Proposal

January 17, 2024

VIA E-MAIL

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, DC 20549
shareholderproposals@sec.gov

RE: Fidelity National Information Services, Inc.
Withdrawal of No-Action Request Submitted January 10, 2024

Ladies and Gentlemen:

Fidelity National Information Services, Inc., a Georgia corporation (the “Company”), submitted a “no-action request” letter (the “No-Action Request”) to the staff (the “Staff”) of the Division of Corporation Finance of the Securities and Exchange Commission (the “Commission”) on January 10, 2024, via the Commission’s online shareholder proposal form with respect to a shareholder proposal dated December 5, 2023 (the “Proposal”) submitted by Inspire Investing LLC (the “Proponent”).

The Proponent withdrew the Proposal on January 11, 2024. The letter withdrawing the Proposal is included as Exhibit A hereto. The Company hereby withdraws its No-Action Request.

If the Staff has any questions with respect to the foregoing, please do not hesitate to contact me at Danielle Scalzo at dscalzo@willkie.com or 212-728-8620.

Sincerely,



Danielle Scalzo

Enclosures

Cc: Caroline Tsai, Fidelity National Information Services, Inc.
Robert Netzly, Inspire Investing LLC

EXHIBIT A
(see attached)

Via Email

January 11, 2024

Attn: Secretary of the Company
Fidelity National Information Services
347 Riverside Avenue
Jacksonville, Florida 32202

Re: Withdrawal of Shareholder Proposal for 2024 Annual Meeting

To whom it may concern,

Inspire Investing, LLC hereby withdraws the 14a-8 shareholder proposal submitted for inclusion in the Fidelity National Information Services' 2024 proxy materials.

Sincerely,

Robert Netzly

Robert Netzly
Chief Executive Officer

Tim Schwarzenberger

Tim Schwarzenberger, CFA
Director of Shareholder Engagement