



AMENDED AND RESTATED INSIDER TRADING POLICY

Responsible Unit: Legal & Compliance Division

APPROVED EVERTEC, INC.
BOARD OF DIRECTORS
MEETING HELD ON

February 15, 2024

A handwritten signature in blue ink, appearing to be "J. M.", written over a horizontal line.

SECRETARY

Corporate Statement

Evertec is committed to complying with all laws and regulations that apply to its global operations, as well as maintaining its standing as a safe and strong organization with the fundamental goal of protecting its customers, the integrity of the institution, its people, and its reputation. It is Evertec's policy to not misuse and prevent the unauthorized disclosure of Material Nonpublic Information (as defined herein), in accordance with this Amended and Restated Insider Trading Policy (this "**Policy**").

Key Terms

Authorized Spokespersons – means those persons specifically authorized in Evertec's Disclosure Policy to make announcements regarding Evertec's Material Nonpublic Information.

Evertec Insiders – means all Evertec directors, officers¹ and employees, whether trading on their own behalf or on behalf of others, including on behalf of Evertec. Evertec Insiders are also responsible for ensuring the following persons and entities comply with this Policy as though their actions were the actions of the Evertec Insider: (a) family members who reside with the Evertec Insider, (b) anyone else who lives in the Evertec Insider's household, and (c) any other family member or person or entity whose transactions in Evertec Securities are directed by the Evertec Insider or are subject to the Evertec Insider's influence or control (such as parents, siblings or children of an Evertec Insider who consult with him/her before trading in Evertec Securities), even if such family members do not live in the Evertec Insider's household. This Policy also applies to any entities controlled by individuals subject to the Policy, including any corporations, limited liability companies, partnerships or trusts, and transactions by these entities should be treated for the purposes of this Policy as if they were for the individual's own account. Evertec may determine that this Policy applies to additional persons with access to material nonpublic information, such as contractors or consultants. Evertec Insiders also encompass former directors, officers and employees for ninety (90) calendar days after their last day of service with Evertec.

Evertec – means Evertec, Inc. and all its direct and indirect affiliates and subsidiaries.

Evertec Securities – means common stock, options to purchase common stock, and any other securities that may be issued by Evertec, including debt securities, preferred stock, convertible debentures, notes, warrants, exchange-traded options, puts, calls and other derivative securities.

"Purchase" and "sale" are defined broadly under federal securities law. "Purchase" includes not only the actual purchase of a security, but also any contract to purchase or otherwise acquire a security. "Sale" includes not only the actual sale of a security, but also any contract to sell or otherwise dispose of a security. These definitions extend to a broad range of transactions, including conventional cash-for-stock transactions, conversions, the exercise of stock options, transfers, gifts, and acquisitions and exercises of warrants or puts, calls, pledging and margin loans, or other derivative securities.

Material Information – means any information for which there is a substantial likelihood that a reasonable investor or shareholder would consider important in deciding to buy, hold or sell securities, or that, if disclosed, would be viewed by a reasonable investor as having significantly altered the total mix of the information in the marketplace about Evertec. Any information that could be expected to affect the market price of Evertec Securities, whether it is positive or negative, should be considered material. If an individual is unsure whether the information is material, the individual should either

¹For purposes of this Policy, "**officer**" has the meaning of the term in Rule 16a-1(f) under the Securities Exchange Act of 1934, as amended (the "**Exchange Act**"), which means Evertec's president, principal financial officer, principal accounting officer (or, if there is no such accounting officer, the controller), any vice-president of Evertec in charge of a principal business unit, division or function (such as sales, administration or finance), any other officer who performs a policy-making function, or any other person who performs similar policy-making functions for Evertec.

assume it is material or consult Evertec's Legal & Compliance Division. Examples of material information may include (but are not limited to) information about:

- corporate earnings or earnings forecasts;
- possible mergers, acquisitions, tender offers, or dispositions;
- major new products or product developments;
- important business developments, such as developments regarding strategic collaborations;
- management or control changes;
- significant financing developments including pending public sales or offerings of debt or equity securities;
- defaults on borrowings;
- bankruptcies;
- cybersecurity or data security incidents; and
- significant litigation or regulatory actions.

Material Nonpublic Information – means information that is both Material Information and Nonpublic Information.

Nonpublic Information – means information that has not been disclosed broadly to the marketplace in a Regulation FD-compliant method (such as through a press release, a U.S. Securities Exchange Commission (“**SEC**”) filing, a Regulation FD-compliant (i.e., appropriately pre-announced and publicly accessible) conference call or a similar method of general dissemination or circulation). For information to be considered public, it must be widely disseminated in a manner that makes it generally accessible to investors. The circulation of rumors, even if accurate and reported in the media, does not constitute effective dissemination. Even after such information is broadly disclosed to the marketplace, it is deemed nonpublic until a sufficient period of time elapses for the investing public to absorb it. If an individual is unsure about whether the information is nonpublic, the individual should either assume it is nonpublic or consult Evertec's Legal & Compliance Division. For specific examples of information that ordinarily would be regarded as material to Evertec, or about when information is considered “public” for purposes of this Policy, please refer to the Insider Trading Procedures (the “**Procedures**”). The circulation of rumors, even if accurate and reported in the media, does not constitute public dissemination. In addition, even after a public announcement, a reasonable period of time may need to lapse in order for the market to react to the information. Generally, the passage of two full trading days following release of the information to the public, is a reasonable waiting period before such information is deemed to be public.

Specifically Designated Persons (“**SDP**”) – means Evertec directors, officers, and employees who, given their access to financial and other sensitive information about Evertec, have been (or may be) specifically designated by Evertec from time to time as being subject to additional restrictions regarding trading in Evertec Securities. SDPs are subject to certain blackout period restrictions and pre-clearance requirements set forth in the Procedures with respect to transactions involving Evertec Securities.

Purpose and Scope

Evertec has adopted this Policy to prevent even the appearance of improper conduct on the part of anyone employed by, or affiliated with, Evertec. To highlight the importance of viewing insider trading within the context of corporate ethics and compliance, certain concepts included in this Policy have also been incorporated within Evertec's Code of Ethics.

This Policy provides substantive information on the insider trading provisions as well as standards of conduct and practices that must be followed with respect to certain kinds of transactions in order to ensure such compliance. Evertec personnel should refer to the Policy Principles section of this Policy and to the related Procedures to guide their actions when engaging in activities that may implicate insider trading concerns.

This Policy and the Procedures are in part intended to assist Evertec Insiders in understanding and complying with applicable insider trading laws and regulations. Nevertheless, the ultimate responsibility for complying with this Policy and the Procedures and avoiding improper transactions and other violations of applicable insider trading laws and regulations rests with the individual Evertec Insider.

Failure of Evertec Insiders to adhere to this Policy, the Procedures, or applicable law will result in appropriate disciplinary action by Evertec (up to termination) and could give rise to significant criminal or civil penalties for the individual and Evertec. Any noncompliance may also endanger the viability of Evertec's business.

Evertec reserves its right to interpret, at its own discretion, any clause contained in this Policy. This includes, but is not limited to, the interpretation of any ambiguous clause at its own discretion and may include amendments to, or departures from, the terms of this Policy, to the extent consistent with the general purpose of this Policy and applicable securities laws. Actions taken by Evertec, the Evertec Legal & Compliance Division, and other Evertec personnel do not constitute legal advice, nor do they insulate you from the consequences of noncompliance with this Policy or with securities laws.

Overview of Policy Provisions

Federal and state securities laws prohibit "insider trading," or the purchase, sale, recommendation, or transfer of a security based on "inside" or Material Nonpublic Information, about an issuer, and in breach of trust or confidence. These laws also prohibit anyone who is aware of material nonpublic information from providing this information (or "tipping") to others who may trade. Although "insider trading" and "tipping" are separate and distinct concepts, both are generally addressed by insider trading laws, and will therefore be collectively discussed in this Policy. Violating such laws can undermine investor trust, harm the reputation and integrity of Evertec, and result in dismissal from Evertec or even serious criminal and civil charges against the individual and Evertec.

Policy Principles

This Policy upholds the following core principles in support of Evertec's commitment to complying with "insider trading" provisions and maintaining the highest standards of ethical business conduct.

1. General Prohibitions

No Evertec Insider who is aware of Material Nonpublic Information relating to Evertec (or any other company that the Evertec Insider has obtained Material Nonpublic Information about in the course of employment with, or the performance of services on behalf of, Evertec, including, but not limited to suppliers, customers, competitors, joint venture partners, or firms with which Evertec may be negotiating a major transaction) may either directly or through or on behalf of family members or other persons or entities purchase or sell in breach of a duty of trust or confidence, whether the issuer of such security is Evertec or any other company any type of security while in possession of Material Nonpublic Information relating to the security or the issuer of such security in breach of a duty of trust or confidence, whether the issuer of such security is Evertec or any other company. In addition, if an Evertec Insider is in possession of Material Nonpublic Information about other publicly-traded companies, such as suppliers, customers, competitors or potential acquisition targets, such Evertec Insider may not trade in such other companies' securities until the information becomes public or is no longer material. Further, no Evertec Insider shall purchase or sell any security of any other company, including another company in Evertec's industry, while in possession of Material Nonpublic Information if such information is obtained during the Evertec Insider's employment or service with Evertec. Finally, no Evertec Insider

shall engage in any other action to take personal advantage of the Material Nonpublic Information or pass the Material Nonpublic Information on to others outside Evertec, including family members, clients, colleagues and friends, whether through a tip, recommendation or opinion. Evertec Insiders shall not directly or indirectly communicate Material Nonpublic Information to anyone outside Evertec (except in accordance with Evertec's policies regarding confidential information) or to anyone within Evertec other than on a "need-to-know" basis. Evertec Insiders must keep in mind that anyone scrutinizing their transactions will be doing so after the fact, with the benefit of hindsight. Therefore, as a practical matter, before engaging in any transaction, Evertec Insiders should carefully consider how enforcement authorities and others might view the transaction in hindsight, particularly in the current closely scrutinized corporate environment.

Evertec expects all Evertec Insiders to conduct their personal financial affairs in a responsible and prudent manner and encourages them to manage and develop personal financial resources responsibly within their means, maintain a sound financial condition and invest in a responsible manner with a view to achieving long term financial goals. Evertec Insiders must never engage in investment practices that, by nature or practice are, or appear to be, inconsistent with this Policy, illegal, improper, unethical or that present a real or apparent conflict of interest.

Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for a personal emergency or required expenditure) are not exempted from the requirements of applicable laws and regulations and the requirements of this Policy and the Procedures. Securities laws and regulations do not recognize such mitigating circumstances and, in any event, even the appearance of an improper transaction must be avoided to preserve Evertec's reputation for adhering to the highest standard of conduct.

There will be times in which an Evertec Insider may need to disclose confidential information about Evertec and its business, which may include Material Nonpublic Information, to third parties in a business transaction, such as a merger, acquisition or joint venture. In these cases, Evertec's Contracting Guidelines provide for the execution of a non-disclosure and confidentiality agreement ("**NDA**") between the parties, specifying the information considered confidential and prohibiting the other party from using or disclosing it. All Evertec Insiders involved in the negotiation and contracting of business opportunities must comply with the NDA requirements set forth in the Contracting Guidelines and shall consult the Legal & Compliance Division. Evertec Insiders involved in such negotiations and contracting of business opportunities and/or in possession of Material Nonpublic Information regarding Evertec may also be required to enter into an NDA to protect such information.

2. Speculative and Hedging Transactions

Evertec Insiders may not (a) engage in speculative transactions in Evertec Securities (for example, transactions in which the Evertec Insider is trying to profit from short-term movements, either increases or decreases, in the price of Evertec Securities) or other transactions that could otherwise give the appearance of impropriety; nor (b) purchase financial instruments, including variable forward contracts, puts, calls, equity swaps, collars and exchange funds, designed to hedge or offset any decrease in market value of Evertec Securities held by such Evertec Insider. Additional information and examples of speculative transactions may be included in the Procedures.

3. Selective Disclosure

Evertec is required under federal securities laws to avoid the selective disclosure of Material Nonpublic Information. The announcement of Evertec information to security holders and the investment community is regulated by Evertec's Disclosure Policy and may only be made by Authorized Spokespersons. In accordance with this requirement, Evertec has specifically designated the Authorized Spokespersons as the only representatives authorized to comment on corporate developments that could be of significance to the investing public. No Evertec Insider who receives or has access to Material Nonpublic Information may comment on such information or on any other Evertec information that could be of significance to the investing public, at any time. Additional information regarding the prohibition on the selective disclosure of Material Nonpublic Information is available in the Procedures.

4. Blackout Periods

Evertec establishes regular blackout periods, during which time SDPs may not engage in transactions in Evertec Securities. Regular blackout periods may also be applicable to other Evertec Insiders, as needed.

Special blackout periods may also be established by Evertec from time to time, during which SDPs and/or certain or all Evertec Insiders may be prohibited from entering into transactions involving Evertec Securities and/or securities of other companies.

General Process

1. Pre-Clearance Procedures

The laws and regulations concerning insider trading are complex, and Evertec Insiders are encouraged to seek guidance from the Legal & Compliance Division prior to considering a transaction in Company securities.

Without limiting the foregoing, (a) all transactions in Evertec Securities by Evertec Insiders on behalf or for the account of Evertec or by SDPs, as well as (b) the adoption, modification or termination of any Trading Plan (as defined below) or any other prearranged trading plan, must be pre-cleared with (a) Evertec's Legal & Compliance Division and (b) the Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO") or the Evertec Insider's Division Manager, as applicable, before entering into any transaction or acting with respect to any such plan. Evertec expects all Evertec Insiders to become familiar with, and abide by, Evertec's pre-clearance process, as defined in the Procedures. Pre-clearance should not be understood to represent legal advice by Evertec that a proposed transaction complies with the law. None of Evertec, Evertec's Legal & Compliance Division or other employees will have any liability for any delay in reviewing, or refusal of, a request for pre-clearance.

2. Inadvertent Disclosures

Should an Evertec Insider inadvertently comment on any Evertec Securities price movements, rumors or otherwise disclose Material Nonpublic Information to a third party, he/she must promptly contact Evertec's Legal & Compliance Division.

3. Application of Policy after Termination of Employment

If an Evertec Insider's employment or affiliation with Evertec terminates at a time when he/she has or thinks he/she may have Material Nonpublic Information covered by this Policy, the prohibition on trading on such information set forth in this Policy will continue until such information becomes public or is no longer material. In addition, for a period of ninety (90) calendar days after the last day of service with Evertec of any SDP, such SDP must be pre-cleared with Evertec's Legal & Compliance Division and the CEO, CFO, or the Evertec Insider's former Division Manager before entering into any transaction in Evertec Securities.

4. Non-Compliance Notifications

Any Evertec Insider who violates this Policy or any federal or state insider trading law or regulation, or knows of any such violation by any other Evertec Insider, must report the situation immediately to Evertec's Legal & Compliance Division or through Evertec's Ethics Line (<http://everteceithicsline.com>) if the Evertec Insider desires to maintain his or her anonymity, in which case the notification will be referred to the Legal & Compliance Division by Evertec's Ethics Officer.

5. Rule 10b5-1 Trading Plans

The trading restrictions set forth in this Policy, other than those transactions described under the Speculative and Hedging Transactions section of this Policy, do not apply to transactions under a previously established contract, plan or instruction to trade in Evertec's securities entered into in accordance with Rule 10b5-1 (a "**Trading Plan**") that:

- has been submitted to and preapproved by Evertec's Legal & Compliance Division;
- includes a "Cooling-Off Period" for
 - Section 16 reporting persons that extends to the later of 90 days after adoption or modification of a Trading Plan or two business days after filing the Form 10-K or Form 10-Q covering the fiscal quarter in which the Trading Plan was adopted, up to a maximum of 120 days; and
 - employees and any other persons, other than Evertec, that extends 30 days after adoption or modification of a Trading Plan;
- for Section 16 reporting persons, includes a representation in the Trading Plan that the Section 16 reporting person is (1) not aware of any Material Nonpublic Information about Evertec or its securities; and (2) adopting the Trading Plan in good faith and not as part of a plan or scheme to evade Rule 10b-5;
- has been entered into in good faith at a time when the individual was not in possession of Material Nonpublic Information about Evertec and not otherwise in a blackout period, and the person who entered into the Trading Plan has acted in good faith with respect to the Trading Plan;
- either (1) specifies the amounts, prices, and dates of all transactions under the Trading Plan; or (2) provides a written formula, algorithm, or computer program for determining the amount, price, and date of the transactions, and (3) prohibits the individual from exercising any subsequent influence over the transactions; and
- complies with all other applicable requirements of Rule 10b5-1.

Evertec's Legal & Compliance Division may impose such other conditions on the implementation and operation of the Trading Plan as Evertec's Legal & Compliance Division deems necessary or advisable. Evertec Insiders may not adopt more than one Trading Plan at a time except under the limited circumstances permitted by Rule 10b5-1 and subject to preapproval by Evertec's Legal & Compliance Division.

An Evertec Insider may only modify a Trading Plan outside of a blackout period and, in any event, when such Evertec Insider does not possess Material Nonpublic Information. Modifications to and terminations of a Trading Plan are subject to preapproval by Evertec's Legal & Compliance Division and modifications of a Trading Plan that changes the amount, price, or timing of the purchase or sale of the securities underlying a Trading Plan will trigger a new Cooling-Off Period.

Evertec reserves the right to publicly disclose, announce, or respond to inquiries from the media regarding the adoption, modification, or termination of a Trading Plan and non-Rule 10b5-1 trading arrangements, or the execution of transactions made under a Trading Plan. Evertec also reserves the right from time to time to suspend, discontinue, or otherwise prohibit transactions under a Trading Plan if Evertec's Legal & Compliance Division or the Board of Directors, in its discretion, determines that such suspension, discontinuation, or other prohibition is in the best interests of Evertec.

Compliance of a Trading Plan with the terms of Rule 10b5-1 and the execution of transactions pursuant to the Trading Plan are the sole responsibility of the person initiating the Trading Plan, and neither Evertec nor Evertec's Legal & Compliance Division employees or Evertec's other employees assume any liability for any delay in reviewing and/or refusing to approve a Trading Plan submitted for approval, nor the legality or consequences relating to a person entering into, informing Evertec of, or trading under, a Trading Plan.

Sanctions

1. Civil and Criminal Penalties

The consequences of prohibited insider trading or tipping can be severe. Persons violating insider trading or tipping laws and regulations may be required to: (a) return the profit made or the loss avoided by the trading; (b) pay the loss suffered by the person who purchased securities from or sold securities to the Evertec Insider or tippee; (c) pay civil penalties up to three times the profit made or the loss avoided; (d) pay a criminal penalty of up to \$5 million (or \$25 million for corporations); and (e) serve a jail term of up to twenty years. Evertec may also be required to pay major civil or criminal penalties. Employers and other controlling persons (including supervisory personnel) who are deemed to have recklessly failed to take preventive steps to control insider trading may, among other things, face civil penalties of up to the greater of approximately \$2,300,000, or three times the profit made, or loss avoided, as a result of the violation and criminal penalties of up to \$25,000,000. In addition, insider trading violations are not limited to violations of the federal securities laws. Other federal and state civil or criminal laws, such as the laws prohibiting mail and wire fraud and the Racketeer Influenced and Corrupt Organizations Act (RICO), also may be violated in connection with insider trading.

Thus, it is important to both the Evertec Insider and Evertec that insider trading violations do not occur. Evertec Insiders should be aware that stock market surveillance techniques are becoming more sophisticated and advanced, and the chance that authorities will detect and prosecute small-level trading is significant.

2. Discipline

The responsibility for adhering to this Policy and the Procedures, and any related procedures or guidelines, will rest with each individual Evertec Insider. Therefore, violations of this Policy, the Procedures or any federal or state insider trading law or regulation by any Evertec Insider may, in the case of a director, subject the director to dismissal proceedings and, in the case of an officer or employee, subject the officer or employee to disciplinary action by Evertec, up to and including termination for cause. Evertec is not required to await the filing or conclusion of a civil or criminal action against an alleged violator before taking disciplinary action.

Certification of Compliance

All directors, officers, employees, and others subject to this Policy may be asked periodically to certify their compliance with the terms and provisions of this Policy.