

TAX STRATEGY

WITH EFFECT FROM DECEMBER 2023

1. INTRODUCTION

This document sets out ACI Worldwide, Inc. & Subsidiaries (“ACI” or “Group”) policy and approach to conducting its tax affairs and dealing with tax risk. The document will be periodically reviewed by the Group Tax team, and any amendments will be approved by the Executive Management. It is effective from 2017 and it will remain in effect until any amendments are approved by the Board of Directors or Executive Management.

ACI Worldwide Inc., operates in a highly regulated industry and is trusted by more than 6,000 organizations worldwide. This reputation of trust is earned through dedication to its customers coupled with an ongoing conviction to do what is right. ACI’s policy is to comply with all laws, rules and regulations of the places where it does business.

The Group's tax strategy is supported through corporate governance, which reflects the company’s commitment to monitoring the effectiveness of policies and decision making. This governance is done both at the Board and management level, with a view to enhancing stockholder value over the long term. Management is responsible for operating the Group companies in an effective, ethical, and legal manner designed to produce value for ACI’s stockholders consistent with the Group’s policies and standards, included in the guidelines.

The Group will maintain, and the management will oversee compliance with the various governance policies that are applicable to all employees and directors of the Group. These policies may be modified or replaced from time to time by the Board or the Audit Committee.

2. GOVERNANCE

In ACI, Tax is managed through the Head of Corporate Tax and a Global Corporate Tax team. ACI is committed to compliance with tax law and practices in all countries in which it operates. Compliance for ACI means paying the right amount of tax at the right time. It also involves disclosing all relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

3. APPROACH TO RISK MANAGEMENT AND GOVERNANCE ARRANGEMENTS IN RELATION TO TAXATION

ACI’s consistent approach to tax risk management is based on the core principles of reasonable care and materiality. Given the scale of its business and volume of tax obligations, risks will inevitably arise from time to time in relation to the interpretation of tax law and nature of its compliance arrangements. ACI sees compliance with tax legislation as key to managing its tax risk. ACI actively seeks to identify, evaluate, monitor, and manage these risks. Where there is significant uncertainty or complexity in relation to a risk, external advice will be sought.

4. ATTITUDE TO TAX PLANNING

ACI undertakes tax planning as part of its overall business strategy. All tax planning is underpinned by commercial and economic substance and is based on business purpose. The Group does seek to take advantage of tax incentives, reliefs, and exemptions available in accordance with legislation, but does not undertake aggressive tax planning or engage in artificial transactions, the sole purpose of which is to reduce tax.

5. RELATIONSHIP WITH TAX AUTHORITIES

ACI is committed to conducting its tax affairs in an open and transparent way. ACI's dealings with the tax authorities and other relevant bodies across the globe will be conducted in a collaborative and timely manner. ACI's aim is to achieve agreement and certainty on disputed matters in a timely manner. ACI is prepared to litigate, where it disagrees with a ruling or a decision of a tax authority but will first seek to resolve any disputed matters through pro-active and transparent discussion and negotiation.

The ACI Group intends this tax strategy document to satisfy any statutory responsibilities it may have in certain territories to publish a tax strategy. The statements in this strategy apply equally to all territories in which ACI operates.