



# ACI Worldwide Anti-Slavery Policy

Release 1.0

Classification: Confidential



UNIVERSAL  
PAYMENTS<sup>SM</sup>

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## Section 1.0: Purpose

It is the policy of ACI, or any entity or individual operating on its behalf, to comply with all laws and regulations to which it is subject, and to promote a culture of fair and ethical practices. Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person's liberty by another in-order-to exploit them for personal or commercial gain. ACI is committed to ensuring there is transparency in our own business and in our approach to preventing modern slavery throughout our supply chains. Consistent with our Code of Conduct, it is all employees' responsibilities to ensure modern slavery is not taking place in our own business or in our supply chains

## Section 2.0: Scope

This policy applies to all persons working for ACI or its respective subsidiaries, or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

## Section 3.0: Notifications of Non-Compliance

Employees are required to notify the Compliance Committee directly, or through the Company's whistle blower hotline, if they believe or suspect that a breach of this policy, has occurred, or may occur, in the future. If unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, employees should be encouraged to raise those inquiries with the Compliance Committee as well.

Employees should submit all communications to the Compliance Committee to [grp-aci-compliance-committee@aciworldwide.com](mailto:grp-aci-compliance-committee@aciworldwide.com)

ACI's whistleblower hotline can be reached through the contact information below:

ACI Alertline Toll Free (USA and Canada): 800-454-8167  
ACI Alertline International Collect Call: +1 503-268-5712  
ACI Alertline Website: <https://aciworldwide.alertline.com>

## Section 4.0: Responsibility of this Policy

Subject to Board review, our Chief Compliance Officer has responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery

## Section 5.0: Breach of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may also terminate our relationship with other individuals and organizations working on our behalf if they breach this policy.