

ANTI-SLAVERY POLICY

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INTRODUCTION

The Anti-Slavery Policy (Policy) states ACI's commitment to conducting its business ethically and in compliance with applicable laws and regulations related to preventing slavery, forced labor, and human trafficking. ACI has a zero-tolerance approach to modern slavery in any form in ACI's operations, supply chains, or business relationships.

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 ("employees").

This Policy is a subordinate policy of ACI's Compliance Risk Management Policy.

This Policy is approved by the Risk and Compliance Steering Committee, provided to the Board and applies to ACI Worldwide Inc and its subsidiaries (ACI) and all employees, temporary staff, contractors, contingent workers, and consultants globally.

DEFINITIONS

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.

ROLES AND RESPONSIBILITIES

This Policy is a subordinate policy to the Compliance Risk Management Policy and all roles and responsibilities stated their apply in this policy.

MODERN SLAVERY

ACI is committed to ensuring there is transparency in ACI's business and in ACI's approach to preventing Modern Slavery throughout our supply chains. Consistent with the ACI Code of Business Conduct and Ethics, it is all ACI employees' responsibilities to ensure Modern Slavery is not taking place in ACI's business or in ACI's supply chains. ACI does not tolerate any form of slavery, human trafficking, or exploitation in our business operations or supply chain. ACI strictly prohibits:

- The use of forced, bonded, or involuntary labor in any form;
- Any form of human trafficking or exploitation in our operations or supply chains; and
- Retaliation against individuals who report concerns related to modern slavery as stated in the ACI Helpline Report Protection Policy.

Employees are required to notify the Regulatory Compliance team, or through the ACI Helpline, if an employee believes or suspects 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 inquires with the Regulatory Compliance team.

The Regulatory Compliance team has responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, maintaining the [Modern Slavery and Human Trafficking Statement](#), and auditing internal control systems and procedures to ensure they are effective in countering Modern Slavery.

POLICY GOVERNANCE

This Policy is required to be reviewed and approved minimally on an annual basis by the Policy owner and domain approvers. The Policy owner is responsible for conducting the review and necessary revisions as well as collecting the required approvers for their business unit. The Policy owner reserves the right to modify this policy and all procedures associated with this policy, in its sole discretion, at any time.

POLICY COMPLIANCE

Breach of this Policy by any ACI employee could result in disciplinary action, up to and including termination of employment. ACI may also terminate a relationship with other individuals and/or organizations working on behalf of ACI if they breach this policy.

POLICY EXCEPTIONS

There are no exceptions allowed to this Policy as this Policy covers regulatory requirements, and ACI has zero tolerance for violations of laws and regulations.

CONTACT

All communications about this Policy should be sent to the Regulatory Compliance team via email Compliance-and-Ethics@aciworldwide.com or through the ACI Helpline.

DOCUMENT INFORMATION

Policy Owner: Megan Revels

Policy ID: ACIW-048

Related Documents: This Policy is subordinate to the Compliance Risk Management Policy.

Related Compliance policies include:

ACI Helpline Report Protection Policy - Establishes protection of employees who have reported suspected wrongdoing to prevent retaliation in concert with whistleblower protection laws.

Code of Business Conduct and Ethics – Sets guidelines for ethical and legal employee standards and business conduct.