

ACI THIRD PARTY CODE OF CONDUCT

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INTRODUCTION

At ACI, we hold ourselves to the highest business standards and seek to work with Third Parties who do the same. We define a “Third Party” as any entity or person not under the direct business control of ACI with whom ACI engages in a business relationship, including any vendor, supplier, support provider, fulfillment provider, agent, consultant, advisor, contractor, business, marketing or strategic partner. The ACI Third Party Code of Conduct (the “Third Party Code”) is an extension of our own [Code of Business Conduct and Ethics](#) and provides guidelines for responsible business conduct. In this Third Party Code, ACI has outlined the main principles of how we work with our Third Parties, as well as expectations related to legal, regulatory, sustainability, and ethical compliance standards.

SCOPE

All Third Parties engaged by ACI are expected to conduct business in accordance with this Third Party Code. This includes the implementation of appropriate policies and practices, communication, and enforcement of the provisions of this Third Party Code throughout their organization and across their supply chains. In case any of the provisions herein conflict with either contractual stipulations between the Third Party and ACI, or ACI’s Purchase Order Terms, the contractual stipulations or the General Terms and Conditions of Purchase shall prevail.

POLICY CONTENT

ACI supports the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. The ACI Third Party Code of Conduct is based on, amongst other international standards: the International Bill of Human Rights, the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work, and the UNGPs.

COMPLIANCE WITH LAWS

ACI Third Parties are expected to comply with laws and regulations applicable to their businesses, including local laws and regulations in all the geographies in which they operate.

ANTI-SLAVERY

ACI Third Parties are expected to ensure that all personnel performing services for ACI are doing so on a voluntary basis, with the freedom to terminate their employment status at their own discretion subject to lawful notice provisions that may apply. Slavery, forced labor, indentured work, and human trafficking of any kind should not be permitted under any circumstances. For more information, see the [ACI Anti-Slavery Policy](#).

CHILD LABOR

ACI Third Parties are expected to comply with all local minimum working age laws and requirements and under no circumstances use child labor in any capacity or employ people under the legal minimum working age.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

ACI Third Parties are expected to respect the rights of employees to establish and join (or refrain from joining) a legal organization (including trade unions) of their own choosing without being penalized for their non-violent exercise of these rights.

DISCRIMINATION AND HARASSMENT

ACI Third Parties will not discriminate on the basis of any condition or characteristic which is protected by applicable law or regulation. Harassment can take many forms, including physical actions, written or spoken comments, videos or pictures, and innuendo. Derogatory comments based on racial or ethnic characteristics, unwelcome sexual advances, and similar behaviors are prohibited.

No person is to be unfairly disadvantaged, favored, or prejudiced because of protected characteristics such as age, disability, genetic information, ethnic origin, medical status, family status, gender, gender expression, gender identity, national origin, citizenship status, physical characteristics, pregnancy, religion, sexual orientation, skin color, social origin, union membership, military and veteran status, or any unlawful criteria under applicable law.

WORKING HOURS

ACI Third Parties are expected to comply with all applicable laws and regulations with respect to hours worked (including overtime hours) and working days.

WAGES AND BENEFITS

ACI Third Parties are expected to provide and pay fair and competitive wages, and any legally mandated benefits. Any wage withholdings must be taken in accordance with applicable laws.

OCCUPATIONAL HEALTH AND SAFETY

ACI Third Parties are expected to conduct operations in compliance with all applicable health and safety laws and regulations. Third Parties are expected to control worker exposure to potential safety hazards through proper design, engineering, administrative controls, preventative maintenance, safe work procedures, and ongoing safety training. Workers will not be disciplined or retaliated against for raising safety concerns. As a part of their occupational health and safety program, ACI Third Parties are expected to have an emergency response plan in place to safeguard employees.

ENVIRONMENT

ACI Third Parties are expected to comply with applicable environmental laws and regulations, including but not limited to laws and regulations that address hazardous materials, air emissions, waste, and wastewater discharges. ACI Third Parties are encouraged to reduce adverse impacts on the environment, to conserve natural resources, and to inventory and report on greenhouse gas emissions to manage their carbon footprint.

COMPETITION AND FAIR DEALING

ACI Third Parties are expected to commit to free and open competition and adhere to principles of fair dealing in all their undertakings. Fair business principles prohibit agreements between competitors that affect prices, costs, terms or conditions, or involve manipulation or misrepresentation of material facts or other unfair practices. ACI Third Parties are expected to comply with all applicable laws, including trade controls, sanctions, export, and re-export regulations.

ANTI-BOYCOTT

ACI Third Parties are expected to comply with all applicable laws and regulations concerning the import and export of products and services. This includes compliance with regulations preventing companies from supporting or cooperating with an unsanctioned boycott of another country, or from doing business with certain persons or entities.

ANTI-BRIBERY AND CORRUPTION

ACI Third Parties are expected to comply with all applicable anti-corruption and bribery laws. ACI Third Parties may not offer or accept bribes to or from anyone and are expected to follow all applicable anti-corruption laws wherever they do business in the world. This guideline also applies to any benefit, gift, gratuity, services, or consideration of any kind to ACI representatives, officers, agents, or employees in exchange for ACI's business. In compliance with global bribery and corruption laws, in particular the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, ACI prohibits giving or accepting anything of value, directly or indirectly, to individuals, officials of foreign governments, or foreign political candidates to obtain or retain business.

CONFLICTS OF INTEREST

ACI Third Parties should avoid any conflicts of interest or situations that give the appearance of a potential conflict of interest in any dealings with ACI or our clients. Should a conflict of interest arise, the Third Party should notify ACI through the ACI Helpline email address provided in the "Raising General Concerns" section of this document.

RISK MANAGEMENT

ACI Third Parties are expected to implement risk management processes to identify and mitigate potential risks associated with their operations. This includes strict adherence to ethical practices, environmental standards, labor laws, and quality control requirements.

RECORD KEEPING

ACI Third Parties are expected to record and report all business information honestly and accurately, including records related to invoicing, reporting, and data collected on behalf of ACI or its clients. ACI Third Parties are expected to comply with all applicable legal and regulatory requirements related to the creation, retention, and disposal of business records. Should record keeping discrepancies occur, they must be reported to ACI along with a plan to remediate and provide corrected data.

INFORMATION SECURITY

ACI Third Parties are expected to comply with all applicable privacy, data protection, and information security laws, including regulatory requirements related to the collection, storage, processing, transmission, or disclosure of data, whether provided by ACI or any party on its behalf, or obtained by the Third Party, including on behalf of ACI or its clients.

ACI Third Parties must properly manage sensitive information, including confidential, proprietary, and personal information of ACI or its clients. Such information should not be used for any purpose other than the business purposes for which it was intended, unless prior authorization has been provided by ACI or its clients and there is a business need.

INTELLECTUAL PROPERTY

ACI Third Parties are expected to follow all laws and regulations regarding intellectual property, including patents, copyrights, trademarks, and the protection against disclosure.

TRAINING

ACI Third Parties are expected to provide workers with access to skills development, training, and opportunities for career advancement at all stages of their work experience.

RAISING GENERAL CONCERNS

ACI Third Parties are expected to have and maintain a process through which their employees, customers, and clients can raise workplace concerns without fear of retaliation. The reporting process should be transparent and ensure the protection of reporting persons. In addition, ACI is committed to maintaining a business environment in which ACI Third Parties feel comfortable raising any good faith concern, free of retaliation. Accordingly, ACI does not tolerate any retaliation against any individual for reporting or participating in good faith in the investigation of any suspected fraudulent activity or violation of the law or this Third Party Code.

ACI Third Parties can report general concerns to the ACI Helpline using the information below. The ACI Helpline is monitored by ACI's Ethics Team. Individuals reporting concerns through ACI Helpline can choose to identify themselves or remain anonymous.

ACI Helpline
Mbox-ACI-Helpline@aciworldwide.com

RAISING DATA PROTECTION CONCERNS

ACI has an additional process to handle personal data protection concerns. ACI Third Parties (or their employees, agents, or representatives) may report such a concern via this process, which is detailed in the [Privacy Policy section of the ACI Worldwide website](#).

POLICY GOVERNANCE

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

COMPLIANCE

ACI Third Parties are expected to comply with all the provisions of this Third Party Code, and ACI

recognizes the need for this Third Party Code to be applied equally to everyone it covers. The Third Party Code will be strictly enforced throughout the supply chain and violations will be dealt with immediately. Failure to conduct business in a manner that meets the provisions of this Third Party Code will be considered a material breach of the third-party relationship and may result in ACI taking remedial action, up to and including financial redress and/or termination of the relationship. Violations of the Third Party Code that involve illegal behavior will be reported to the appropriate authorities.

DOCUMENT INFORMATION

Policy Owner: Jaime Danielson, Pete McEvoy, and Pamela Conner

Policy ID: ACIW-122

Related Documents: The following policies or handbooks are referenced:

- [ACI Code of Business Conduct and Ethics](#) – Establishes guidelines for responsible business conduct and the basic principles of conduct that ACI shares as board members, officers, and employees of ACI.
- [Anti-Slavery Policy](#) – Governs rules around prohibiting modern slavery in any company or supply chain interaction.