

## **MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT**

This statement is made pursuant to Section 54 of the U.K. Modern Slavery Act 2015 (Modern Slavery Act) and sets out ACI Worldwide (EMEA) Limited's ("ACI EMEA") approach to dealing with the potential risk of human slavery and trafficking (as defined in the Act) occurring within ACI EMEA's supply chains or any parts of its business.

### **Introduction**

ACI EMEA is a wholly owned subsidiary of ACI Worldwide, Inc. ("ACI Worldwide", or "ACI" or "Company"). ACI Worldwide is a global software powerhouse, powering electronic payments for more than 5,100 organizations around the world. More than 1,000 of the largest financial institutions and intermediaries as well as thousands of leading merchants globally rely on ACI to execute \$14 trillion each day in payments and securities. ACI EMEA is subject to and follows the ACI Code of Conduct, policies, and programs referenced within this statement

ACI's Code of Conduct, to which every employee must adhere, defines the Company's values and guiding principles. They include a commitment to conduct business ethically as well as compliance with all laws, rules and regulations in the countries where it does business. These guiding principles are embedded in everything the Company does. ACI believes in partnering with others who share its values and who understand the importance of always conducting business ethically.

ACI Worldwide will not tolerate slavery in any of its business or supply chains. The Company is committed to taking steps to end forced labour, whether in the form of human trafficking, indentured labour or otherwise. This statement outlines the efforts to eradicate forced labour from its supply chain.

### **ACI's business and supply chains**

ACI has relationships with many partners across the globe. These relationships include software and hardware vendors, resellers, and professional service providers. ACI establishes a relationship of trust and integrity with all its partners, which is built upon mutually beneficial factors.

ACI EMEA has not been made aware of any allegations of human trafficking/slavery activities against any of its partners. If made aware, then it would act immediately and report the activity to the relevant authorities.

### **Policies**

ACI's Code of Conduct defines the Company's values and continued commitment to ethical business practices. All ACI employees are required to comply with the Code of Conduct in all countries where the Company operates. Primary tenets of Code of Conduct include that it is the Company's policy to comply with all laws, rules, and regulations in the places where it does business, and that no employee, officer, or director of the Company shall commit an illegal or unethical act, nor instruct others to do so, for any reason.

ACI has implemented an Anti-Slavery policy, which specifically describes ACI's commitment to combating modern slavery activities across the globe and lays out the responsibilities of all employees and third parties to report any suspected violations involving slavery or human trafficking, without fear of retaliation. Suspected incidents can be reported directly to ACI's Compliance Committee, or through a confidential helpline to protect the identity of the whistleblowers if they wish to remain anonymous. The policy is in effect as of the date of this statement.

### **Commitment to combat slavery and human trafficking**

ACI EMEA is committed to acting as a responsible and ethical employer and is strongly opposed to any form of slavery or human trafficking.

As a payments software provider, powering electronics payments to financial institutions, intermediaries, and merchants, ACI EMEA believes that there is limited risk of slavery or human trafficking taking place in its supply chain. However, ACI EMEA understands there may be elevated

risk within certain geographies and sectors. In furtherance of that, contracts executed with vendors include a provision for compliance with all laws and regulations, and that the vendor will ensure any affiliates and subcontractors will adhere to the same. As of the date of this statement, ACI EMEA has updated its vendor contract templates to address slavery and human trafficking issues (including compliance with laws and/or adherence to policies) and is committed to furthering its efforts to prevent slavery or human trafficking throughout the business and supply chain. ACI EMEA will continue to review its position to identify potential risks of slavery or human trafficking and will implement standards, procedures, and processes on a go-forward basis as needed.

ACI EMEA currently requires vendors adhere to either ACI's internal policies, as appropriate, or to attest they have policies of similar nature in place (including but not limited to: Code of Conduct, Anti Money Laundering, Anti-Corruption, Anti-Slavery, etc)

### **Vendor Management**

ACI maintains a robust global vendor management program, designed to meet regulatory requirements, perform due diligence, and identify potential risks with vendor engagements. ACI conducts initial and ongoing reviews of its vendors, which includes vendors of ACI EMEA. Initial reviews are performed based on the scope and criticality of the products or services being provided and the potential risk associated with such to ACI. ACI's Vendor Management and Procurement teams work closely with ACI's Risk and Global Information Security teams to ensure business units understand and adhere to regulatory requirements and identify potential risks associated with vendor engagements.

Ongoing monitoring of third party activities is also embedded into ACI's formalized risk appetite process, which requires appropriate escalation and response to any third-party activity that could be considered outside of the Company's defined reputational, legal, or operational risk tolerances.

### **Training**

ACI requires that all employees complete the Company's mandatory compliance training at least annually. As part of that training, employees are required to explicitly acknowledge that they understand their responsibilities with respect to compliance with all governing laws and regulations, as well as operating in a manner consistent with the ethical principles that govern ACI and its subsidiaries.

ACI will continue to work to build awareness of modern slavery and ethical sourcing issues among employees, particularly those responsible for overseeing its modern slavery due diligence as well as buyers of products and services.

This statement covers 1 January 2018 to 31 December 2018 and has been approved by the board of ACI Worldwide (EMEA) Limited's directors.



Director, ACI Worldwide (EMEA) Limited

13-March-2019