

vendor code of conduct

Corporate Policy | Risk Management





our mission statement

To protect and increase the value of our stockholders' investment by providing quality solutions and industry-leading service to our customers. In accomplishing this we feel that it is important to:

- Maintain a work environment that is personally, professionally, and financially rewarding for our employees.
- Concentrate our activities on what we know best – technology solutions and services for financial institutions.
- Provide outstanding commitment and service to our customers so that the perceived value of our solutions and services is consistent with the real value.

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vendor code of conduct

Jack Henry and Associates and its subsidiaries (collectively, “Jack Henry”) are committed to ensuring high standards of business, social, and environmental responsibility throughout our supply chain. All Vendors, including their designated facilities and their subtier Vendors involved in any aspect of the processes, are to maintain a high level of ethics, environmental responsibility, and labor relations to support our commitment to corporate social responsibility. This document outlines Jack Henry’s expectation of its Vendors in areas including human rights and the environment and sets out important business practices. This Vendor Code of Conduct (“Code”) outlines the Vendor’s obligations to do business with Jack Henry. For the purposes of this document, “Vendor” means any corporation, individual, or other entity that provides, or seeks to sell, goods or services to Jack Henry. Jack Henry’s Vendors shall abide by this Code and all applicable laws and regulations of the country or countries in which they are doing business, including labor, health and safety, environmental and criminal law. Furthermore, this document references specific international standards and legislations that require Vendor compliance unless local laws and regulations set a higher standard.

vendor diversity & sustainability statement

At Jack Henry, we believe that by engaging in sustainability discussions and through implementing environmental checks in our supply chain, we will inspire our customers, stakeholders and the community to promote efficient, sustainable practices themselves, and make meaningful efforts to reduce

greenhouse gas emissions. set targets in line with climate science. Jack Henry is committed to providing opportunities for diverse and sustainable businesses to prosper, by actively engaging suppliers that help us address the diverse needs of the marketplace, and by promoting financial inclusion practices for the benefit of minority groups. We expect companies seeking to do business with Jack Henry to demonstrate that the goods and services they provide to us come from sources that share and are committed to our values, such that their business practices are consistent with the needs and expectations of our customers, stakeholders, and the community we serve.

For more information regarding our Supplier Diversity Program, please review our [Supplier Diversity Statement and Guidelines](#) and visit the [Supplier Diversity Portal](#).

compliance with the vendor code of conduct

Failure to comply with this Code may result in Vendor disqualification from doing business with Jack Henry. Jack Henry’s direct Vendor is responsible for their subtier Vendors and for ensuring that the same standards, as set out herein, are applied. Jack Henry reserves the right to audit all entities in the supply chain for compliance.

A Vendor must, in all areas of its business operations, comply with all applicable laws, regulations, and directives of the countries and regions in which it operates. Additionally, each Vendor must ensure that its employees receive information and training in relation to all relevant legal, regulatory, and internal requirements that apply to their jobs.

While Vendors are expected to self-monitor and demonstrate their compliance with this Code, Jack Henry may audit Vendor or inspect Vendor's facilities to confirm compliance.

labor

The Vendor should recognize and be committed to uphold the human rights of all employees. The Vendor should go beyond legal compliance, drawing upon internationally recognized standards to advance social and environmental responsibility.

Health and Safety

The Vendor shall ensure that they provide a healthy and safe working environment for employees. Conditions in all work facilities must be safe, clean, and in compliance with all applicable laws and regulations. The Vendor will have systems to detect, avoid, and respond to potential risks to the health and safety of all associates.

Jack Henry recognizes integrating sound health and safety management practices into all aspects of business is essential and requires the Vendor to commit to creating a healthy work environment and safe working conditions for all their associates. To access our Vendor Safety Program, go to jackhenry.com/more-from-jha/pages/for-vendors.aspx.

At a minimum, the Vendor shall:

- Provide a healthy and safe working environment for all employees.
- Maintain compliance with all applicable health and safety laws and regulations.
- Provide employees access to potable water and adequate sanitary facilities.

- Provide employees with appropriate personal protective equipment necessary to perform their jobs safely.
- Train employees to perform their jobs safely and to maintain and use personal protective equipment correctly.
- Develop and maintain emergency response plans and equipment including evacuation, fire, medical, and other disaster response, and employee training.
- Prohibit the use, possession, distribution, or sale of illegal drugs while on Jack Henry owned or leased property.
- Establish an occupational health and safety management system that, at a minimum, demonstrates that health and safety management is integral to the business, allows for leadership, and encourages employee participation to set policy, roles, responsibilities, and accountabilities, provides for risk and hazard identification and assessment, and provides appropriate communication channels for employee access to health and safety information. This management system must include procedures to address incident recordkeeping, investigation, and correction action.

Child Labor

The Vendor shall not engage child labor. No worker shall be employed under the age of fifteen (15) or fourteen (14) where established by national laws in accordance with the International Labour Organization (ILO) developing-country exception; under the age of completion of compulsory education or under the minimum age for employment in the country, whichever is greater. The Vendor shall maintain copies of legal age documentation of each employee.

Forced Labor and Human Trafficking

The Vendor shall not engage in involuntary, forced, prison, indentured or slave labor, human trafficking or the hiring of trafficking and debt bondage victims.

All employees shall be guaranteed freedom of movement. Overtime work shall be voluntary. The Vendor shall conduct due diligence to prevent the recruitment/hiring of victims of trafficking, debt bondage or other types of exploitation by third parties of such as labor brokers or contractors.

The Vendor should refer to the International Labour Organization Conventions No. 29 and 105, the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices, and the Protocol to Prevent, Suppress, and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention Against Transnational Organized Crime. Prison labor shall mean labor conducted by convicts or labor conducted in lawful confinement.

Harassment Or Abuse

The Vendor shall ensure that no worker is subject to any physical, sexual, psychological, or verbal harassment or abuse. Employees are to be treated with respect and dignity.

Discrimination

Discrimination in employment, including recruitment, hiring, training, working conditions, job assignments, pay, benefits, promotions, discipline, termination, or retirement on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, genetic information, pregnancy, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, and military and veteran status, or any other protected status protected by local, state or federal law is prohibited. Hiring,

pay, benefits, training, advancement, discipline, termination, retirement, or any other employment-related decision shall be based on relevant and objective criteria.

Jack Henry is an equal opportunity employer and federal contractor or subcontractor. Consequently, the Vendor agrees that, as applicable, the Vendor will abide by the requirements of 41 CFR 60-1.4(a), 41 CFR 60- 300.5(a), and 41 CFR 60-741.5(a) and that these laws are incorporated herein by reference. These regulations prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities and prohibit discrimination against all individuals based on their race, color, religion, sex, orientation, gender identity, or national origin. These regulations require that covered prime contractors and subcontractors take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status, or disability. The Vendor also agrees that, as applicable, the Vendor will abide by the requirements of Executive Order 13496 (29 CFR Part 471, Appendix A to Subpart A), relating to the notice of employee rights under federal labor laws.

Working Hours

The Vendor shall ensure that working hours of employees comply with state and national laws and are not excessive. Employees shall be allowed at least one (1) day off in every seven (7) day period. The Vendor shall comply with applicable laws, which entitle employees to breaks, vacation time, leave periods, and holidays.

Wages and Benefits

Wages are essential for meeting the basic needs of employees. The Vendor shall compensate their employees by providing wages, including overtime pay, and benefits that satisfy all applicable laws and regulations. minimum age for employment in the country, whichever is greater. The Vendor shall maintain copies of legal age documentation of each employee.

Freedom of Association and Collective Bargaining

The Vendor is required 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.

Grievance Systems

Vendor shall ensure that workers have an effective mechanism to report grievances that facilitates open communication between management and workers.

community engagement

Vendor is encouraged to help foster social and economic development and contribute to the sustainability of the communities in which it operates.

human rights commitment

Jack Henry & Associates is committed to respecting and promoting [human rights](#). Through proactive due diligence, we seek to prevent or mitigate adverse human rights impacts from our own operations.

Where we are directly linked to human rights impacts through our business relationships, we will seek ways to positively influence the human rights actions of our business partners, including our Vendors.

environment

A Vendor should recognize that environmental responsibility is integral to producing high-quality products. In manufacturing operations, adverse effects on the environment and natural resources are to be minimized. The Vendor should be committed to a culture of continuously improving their operations, processes, and products to conserve resources, prevent pollution, and minimize adverse impacts to people and communities.

At a minimum, the Vendor shall:

- Comply with Jack Henry's Environmental Policy
- Comply with all applicable environmental laws and regulations.
- Maintain and comply with all applicable permits and reporting requirements.
- Minimize the risks and environmental impacts from storage, use, transportation, and disposal of hazardous substances.
- Not use substances in operations, processes, or products banned by international conventions (i.e., Ozone Depleting Chemicals, Perfluorooctane-sulfonates, etc.).
- Implement pollution prevention and resource conservation program to reduce environmental impacts by recycling, reusing, or substituting materials and eliminating waste.
- Provide chemical or other environmental compliance data (upon request) for products and materials supplied to Jack Henry.

- Create and maintain documents and records to ensure regulatory and Code of Conduct compliance.
- If requested by Jack Henry and available, disclose complete, consistent, and accurate scope 1, 2, and 3 greenhouse gas (GHG) emissions data and/or components required to calculate GHG emissions data, via CDP or an alternative method that Jack Henry will provide.
 - » If requested by Jack Henry, vendors must provide plans to reduce GHG emissions in alignment with Jack Henry’s requirements.
- Maintain documentation to support compliance with all of the above.

ethics

Jack Henry is committed to conducting business in accordance with the highest ethical standards and in compliance with all applicable laws. Vendors should report any ethical issue (or potential ethical issue) or violation of this Code to Jack Henry immediately. This includes any potential ethical issue by a Jack Henry or Vendor employee; concerns about ethical issues in the procurement process; or any other ethical concerns. There will be no negative reflection on any person or company for reporting an ethical concern in good faith. The Vendor is expected to uphold the highest standards of ethics including:

- **No Corruption, Extortion, or Embezzlement**
All forms of corruption, extortion, and embezzlement are strictly prohibited and may result in immediate termination and legal actions.
- **Disclosure of Information** The Vendor may have access to Jack Henry’s confidential (non-public) information. The Vendor shall hold this confidential information in the strictest confidence and shall not (except as required by

law) disclose it to anyone without Jack Henry’s prior approval and then only on a need-to-know basis. Jack Henry retains exclusive ownership of its confidential information. The Vendor shall not buy or sell Jack Henry’s equity or debt securities based on, or otherwise take advantage of, material, non-public information relating to Jack Henry or its businesses.

- **No Improper Advantage Bribes, gifts, or other means of obtaining undue or improper advantages** are not to be offered or accepted. The Vendor shall not engage in any activity on behalf of Jack Henry including, without limitations, projects, transactions, lobbying, charitable or political donations and appearances before governmental entities, officials, or representatives.
- **Anti-bribery – Kickbacks, Bribes, and Payoffs**
Vendors shall comply with all anti-bribery laws, regulations, and legislation. Vendors must not offer or accept anything of value to secure an improper advantage or benefit. The Vendor shall not offer or accept, either directly or indirectly, kickbacks, bribes, or payoffs in cash or any other form. It does not matter that a prohibited payment may be demanded by a public official; the prohibited payment still may not be made. The Vendor shall not facilitate payments on our behalf nor engage in any activity on behalf of Jack Henry including, without limitations, lobbying, charitable or political donations and appearances before governmental entities, officials, or representatives. The Vendor should maintain standards in compliance with the Foreign Corrupt Practices Act (“FCPA”) and similar anti-bribery laws of other countries (together, “Anti-Bribery Laws”).

- Fair Business, Advertising, and Competition Standards of fair business, advertising, and competition are to be upheld. A Vendor shall not engage in bid collusion and/or customer market allocation with other Jack Henry Vendors. The Vendor shall comply with all applicable antitrust, trade regulation, and competition laws.
- Responsible Sourcing of Materials Vendors shall exercise due diligence on relevant materials in their supply chains. Vendors shall develop particular due diligence policies and management systems to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted to the material processing level to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts.
- Protect and responsibly use the physical and intellectual assets of Jack Henry, including intellectual property, tangible property, supplies, consumables, and equipment, when authorized by Jack Henry to use such assets.
- Use Jack Henry-provided information technology and systems (including email) only for authorized Jack Henry business-related purposes. Jack Henry strictly prohibits Vendors from using Jack Henry provided technology and systems to (i) create, access, store, print, solicit, or send any material that is intimidating, harassing, threatening, abusive, sexually explicit, or otherwise offensive or inappropriate, or (ii) send any false, derogatory, or malicious communications.
- Comply with all Jack Henry requirements and procedures for maintaining passwords, confidentiality, security, and privacy as a condition of providing Jack Henry with goods or services or receiving access to the Jack Henry internal corporate network, systems, and buildings. All data stored or transmitted on Jack Henry-owned or - leased equipment is to be considered private and is the property of Jack Henry. Jack Henry may monitor all use of the corporate network and all systems (including email) and may access all data stored or transmitted using the Jack Henry network.
- Comply with the intellectual property ownership rights of Jack Henry and others including but not limited to copyrights, patents, trademarks, and trade secrets; and manage the transfer of technology and know - how in a manner that protects intellectual property rights.

protection of intellectual property and assets

Protection of intellectual property rights is vital for any company. Jack Henry depends on intellectual property such as information, processes, and technology.

All Jack Henry Vendors must, without limitation:

- Respect and protect the intellectual property rights of all parties by only using information technology and software that has been legitimately acquired and licensed. Use software, hardware, and content only in accordance with their associated licenses or terms of use.

audit and assessments

The Vendor shall perform periodic evaluations of its facilities and operations, and the facilities and operations of its subcontractors and next-tier suppliers that provide goods or services to Jack Henry to ensure compliance with this Code and the law. The Vendor will permit Jack Henry and a third party designated by Jack Henry to periodically evaluate the Vendor's facilities and operations, and those of its subcontractors and next-tier suppliers, to the extent they are providing goods or services to Jack Henry, for Jack Henry's benefit, or for use in Jack Henry products.

We also reserve the right to request that vendors disclose information that may pertain to geographical location of facilities that produce any item supplied to Jack Henry, origin of raw materials produced within their facilities and environmental performance indicators such as Greenhouse Gas emissions.

corrective action process

Vendor shall have a process for timely correction of any deficiencies or violations identified by an internal or external audit, assessment, inspection, investigation, or review.

reporting concerns

Our business conduct must be guided by the highest level of integrity when dealing with our Associates, customers, vendors, and local communities. We expect that Associates and Vendors will not engage in any activity that would call into question Jack Henry's honesty, impartiality, or reputation, and that they will obey all applicable laws and regulations governing our operations anywhere we conduct business.

We have established this hotline through [Lighthouse Services, Inc.](#) for the specific purpose to report fraud, unlawful, unethical, and other types of improper behavior. We provide this hotline as an additional communication tool for specific types of situations because we believe it is a good business practice to do so. We will not tolerate any retaliation against anyone who raises genuine concerns.

Regular business matters that do not require anonymity should be directed to their primary Jack Henry contact, Jack Henry Legal.



Anonymous Online Submission Form:
[Ethics Email Submission](#)

Toll Free Phone: 888-231-9550

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