

# **ACI CODE OF BUSINESS CONDUCT AND ETHICS**

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## TABLE OF CONTENTS

INTRODUCTION.....	4
COMPLIANCE WITH LAWS, RULES, AND REGULATIONS.....	4
CONFLICTS OF INTEREST.....	4
RECORD KEEPING .....	4
PUBLIC REPORTING .....	5
INSIDER TRADING .....	5
CORPORATE OPPORTUNITIES.....	6
COMPETITION AND FAIR DEALING.....	6
BUSINESS ENTERTAINMENT AND GIFTS .....	6
DISCRIMINATION AND HARASSMENT .....	6
HEALTH AND SAFETY.....	6
WORKPLACE VIOLENCE .....	7
REPORTING A CRIMINAL CONVICTION OR BANKRUPTCY .....	7
CONFIDENTIALITY .....	7
OPEN SOURCE SOFTWARE .....	8
PROTECTION & PROPER USE OF COMPANY ASSETS .....	8
EMPLOYEE PRIVACY .....	8
ARTIFICIAL INTELLIGENCE (AI).....	8
ELECTRONIC COMMUNICATIONS AND INFORMATION SECURITY .....	8
ANTI-CORRUPTION/ANTI-BRIBERY .....	9
ANTI-BOYCOTT .....	9
ANTI-SLAVERY .....	9
EXPORT, IMPORT AND SANCTION LAWS .....	9
FINANCIAL INTEREST IN OTHER COMPANIES.....	10
SERVICES TO OTHER COMPANIES .....	10
POLITICAL ACTIVITIES .....	10
RAISING CONCERNS OR REPORTING ILLEGAL OR UNETHICAL BEHAVIOR.....	10
CODE OF ETHICS FOR THE CEO & SENIOR FINANCIAL OFFICERS .....	10

<b>POLICY GOVERNANCE</b> .....	<b>11</b>
<b>POLICY COMPLIANCE</b> .....	<b>11</b>
<b>POLICY EXCEPTIONS</b> .....	<b>11</b>
<b>CONTACT</b> .....	<b>11</b>
<b>DOCUMENT INFORMATION</b> .....	<b>11</b>

## INTRODUCTION

The ACI Code of Business Conduct and Ethics (the “Code”) provides guidelines for responsible business conduct. This Code describes the basic principles of conduct that ACI shares as board members, officers, and employees of ACI Worldwide Inc. and its subsidiaries (“ACI” or the “Company”). Failure to adhere to this Code may result in disciplinary action, up to and including termination.

This Code is intended to guide ACI’s Board of Directors, officers, employees, and contractors (collectively referred to herein as “Employees”) on ethical and legal standards of business conduct. In some circumstances, ACI maintains more specific policies on the topics referred to in this Code. Any questions regarding these policies, should be directed to your manager or the policy owner.

## COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

It is ACI’s policy to comply with all applicable laws, rules, and regulations of the locations where ACI does business. No Employees of the Company shall commit an illegal or unethical act, or instruct others to do so, for any reason. If a law, rule, or regulation is unclear, or conflicts with a provision of this Code, Employees should seek advice from their manager, the Chief Legal & Risk Officer, or the Regulatory Compliance team but always seek to act in accordance with the ethical standards described in this Code.

The Company conducts business and employs associates in many countries around the world. As a result, ACI’s operations are subject to the laws of many countries, provinces, states and municipalities, and regional organizations such as the European Union. As a result, conflicts may exist or arise between the applicable laws of two or more countries. When Employees encounter such a conflict, it is especially important to consult the Chief Legal & Risk Officer through the Regulatory Compliance team to understand how to resolve that conflict properly.

## CONFLICTS OF INTEREST

ACI conducts its business affairs in the best interest of the Company and should therefore avoid situations where private interests of Employees interfere in any way with the Company’s interests or could improperly influence work, business decisions or actions. Employees need to be especially sensitive to situations that have even the appearance of impropriety or divided loyalty and promptly report them to their manager, or if appropriate, a more senior manager or in accordance with the Helpline Report Protection Policy (“Helpline Policy”).

If Employees believe that a transaction, relationship or other circumstance creates or may create a conflict of interest, they should promptly report this concern to [mbox-ACI-Helpline@aciworldwide.com](mailto:mbox-ACI-Helpline@aciworldwide.com) or in a manner provided in the Helpline Policy.

## RECORD KEEPING

ACI’s financial records serve as a basis for managing the Company’s business and fulfilling responsibilities to ACI stockholders, Employees and other stakeholders. The integrity of ACI’s financial records is also important to ensure compliance with accounting, tax, public disclosure laws and regulations, and other requirements.

Individually, Employees are all responsible for recording accurate information in all Company records that are produced, such as expense reports, financial statements, and public disclosure documents. If Employees have any concerns about questionable accounting or audit matters, they should contact the Chief Legal & Risk Officer, Chief Financial Officer or the Chairperson of the Company’s Audit Committee. Employees may also submit concerns anonymously, through the third-party hotline detailed in the Helpline Policy. The Company does not tolerate any acts of retaliation for good faith reports of accounting or audit concerns.

All of ACI’s books, records, accounts, and financial statements are maintained in reasonable detail, appropriately reflect transactions, and conform both to applicable legal requirements and to the

Company's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained without approval of the Company's Chief Financial Officer or the Head of Accounting.

The disposal or destruction of the Company's records and files is not discretionary with any employee. The Company's requirements for record retention are further outlined in the Company's Records Management Policy. In addition, when matters such as litigation (actual or threatened), government inquiries, investigations, or audits are pending or reasonably expected, the Legal Department will notify appropriate personnel so that any relevant records are not destroyed until such matter is closed, and then only in accordance with the Company's Records Management Policy.

ACI avoids exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies in business records and communications. ACI maintains records according to the ACI Records Management Policy. Employees shall comply with all ACI policies, and in accordance with those policies, in the event of litigation or governmental investigation, please consult the Chief Legal Officer.

## **PUBLIC REPORTING**

ACI is a publicly traded company in the US, and as a result files reports and other documents with the Securities and Exchange Commission (SEC) and Nasdaq. ACI issues press releases and makes other public statements that include financial and other information about the Company's business, financial condition, and results of operations. ACI endeavors to make full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and Nasdaq and in press releases and public communications.

ACI requires cooperation and open communication with internal and outside auditors. It is illegal to take any action to fraudulently influence, coerce, manipulate or mislead any internal or external auditor engaged in the performance of an audit of ACI financial statements.

The laws and regulations applicable to filings made with the SEC, including those applicable to accounting matters, are complex. While the ultimate responsibility for the information included in these reports rest with senior management, numerous other employees participate in the preparation of these reports or provide information included in these reports.

ACI maintains disclosure controls and procedures to ensure that the information included in the reports that are filed or submitted to the SEC is collected and communicated to senior management in order to permit timely disclosure of the required information.

If Employees are requested to provide, review, or certify information in connection with ACI's disclosure controls and procedures, you must provide the requested information or otherwise respond in an accurate and timely manner. Moreover, even in the absence of a specific request, Employees should report to their manager or a more senior manager any information that you believe should be considered for disclosure in ACI's reports to the SEC.

If Employees have questions or are uncertain as to how ACI's disclosure controls and procedures may apply in a specific circumstance, promptly contact your manager or a more senior manager. ACI wants Employees to ask questions and seek advice. Additional information regarding how to report questions or concerns (including on a confidential, anonymous basis) is included below in this Code in the section "Raising Concerns or Reporting Illegal or Unethical Behavior."

## **INSIDER TRADING**

Employees must always protect the Company's confidential information, including "inside information." "Inside information" is also known as "material, non-public information." It is information that has not been publicly disclosed and that a reasonable investor would deem significant. Improperly disclosing inside information can result in serious financial, legal, and reputational harm to the Company.

Employees do not trade in Company stock on the basis of "inside information," nor "tip" others who may trade in Company securities. Please refer to the Stock Trading Policy for more detailed information about policy in this area and direct any questions to the Chief Legal & Risk Officer.

## **CORPORATE OPPORTUNITIES**

Company resources should only be used for the Company's benefit, not for the benefit of officers or employees, or for the benefit of a third party. Employees cannot personally take opportunities that are discovered through the use of Company property, information, or position without the prior consent of the ACI Board of Directors. Employees cannot use their position with the Company to obtain favored treatment for themselves or third parties. Employees are also prohibited from competing with the Company.

## **COMPETITION AND FAIR DEALING**

ACI outperforms its competition fairly and honestly by developing leading solutions and technology based on design and performance. ACI cannot engage in unethical or illegal business practices such as stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing disclosure of this type of information by any past or present employees of other companies. Each Employee of the Company should endeavor to deal fairly with customers, suppliers, competitors, the public, and one another at all times and in accordance with ethical business practices.

Antitrust and competition laws are complex and global in reach, varying from country to country. Violating these laws can have very severe consequences not only for the Company but also for individual Employees. Always consult with the Legal department before entering into agreements, or even sharing information, with competitors or customers that may restrict competition.

## **BUSINESS ENTERTAINMENT AND GIFTS**

ACI recognizes that business entertainment and gifts are meant to create goodwill and sound working relationships, not to gain unfair advantage with customers or suppliers. Employees and their family members are prohibited from offering, giving, or accepting any gift or entertainment that is (a) a cash gift, (b) inconsistent with customary business practices, (c) excessive in value, (d) reasonably construed to be a bribe or payoff, and (e) violates any laws or regulations.

Any questionable gift or invitation should be discussed with your manager, Regulatory Compliance team (mbox-ACI-Anti-Corruption@aciworldwide.com), or, if appropriate, a more senior manager. Even small gifts can create a conflict or violate regulations, Employees should always use their best judgment and consider how giving or accepting the gift would appear to others. For more requirements and prohibitions regarding business entertainment and gifts see the ACI Anti-Corruption Policy.

## **DISCRIMINATION AND HARASSMENT**

ACI's most valuable asset is the talented and dedicated Employees who work at ACI. The Company is committed to a work environment where each Employee is treated fairly and with respect, and where every Employee is given a chance to succeed.

ACI is committed to creating, managing and valuing diversity in ACI's workforce. ACI provides equal opportunity in all aspects of employment and prohibits discrimination or harassment of any kind.

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 behavior are prohibited. Please refer to the Anti-Harassment Policies in your geography as specified in the Employee Handbook for more detail.

## **HEALTH AND SAFETY**

ACI strives to provide a safe and healthy work environment. ACI ensures a safe and healthy work environment by following safety and health rules and practices and promptly reporting accidents, injuries, unsafe conditions or other violations or potential violations of applicable OSHA standards (or local equivalent), to your manager or more senior manager.

Employees should report to work in condition to perform their duties at their best and be free from the influence of illegal drugs or alcohol. ACI does not tolerate the possession, use, or distribution of illegal drugs in the workplace.

## **WORKPLACE VIOLENCE**

ACI is committed to providing a safe work environment and takes proactive and preventive measures at all Company locations to reduce the risk of harm from dangerous individuals, both authorized and unauthorized to be on ACI premises. ACI provides education and information to reduce the likelihood of harm to Employees, from people who intend to inflict physical harm on ACI premises.

ACI prohibits violence or threatening behavior of any kind at any Company locations or functions. Any Employee who engages in this kind of conduct or brings threatening materials or objects into the workplace will be subject to disciplinary action.

Each situation is unique and how to best respond to an assailant situation will be determined by the specific circumstances at the time of the event. Any action taken by ACI Employees, vendors, and visitors when faced with an assailant is a personal decision to that individual. Employees should endeavor not to place themselves or others in peril. If Employees find themselves faced with an assailant situation, remain calm and use the ACI Global Workplace Violence Policy to help formulate the best possible plan.

## **REPORTING A CRIMINAL CONVICTION OR BANKRUPTCY**

Employees are required to report any substantial changes in their personal circumstances, including criminal convictions or bankruptcy, post joining the organization. This reporting requirement is essential to ensure compliance with ACI's policies and to maintain the integrity and trust within the Company. Employees must report any felony convictions and any bankruptcy or insolvency proceedings that occur after employment begins.

Reports should be made promptly to your manager, HR representative or through the process detailed in the Helpline Policy. ACI is committed to protecting the confidentiality of this information and ensuring that it is used appropriately within the employment process.

For any questions about this process, Employees should contact [mbox-aci-askhr@aciworldwide.com](mailto:mbox-aci-askhr@aciworldwide.com).

## **CONFIDENTIALITY**

Confidential information is one of the Company's most valuable assets. Unauthorized use, disclosure, or distribution of confidential information is prohibited and could also be illegal, resulting in civil or even criminal penalties.

Confidential information includes proprietary information such as ACI trade secrets, patents, trademarks, copyrights, business, marketing plans, sales forecasts, engineering ideas, designs, databases, records, employee information, and unpublished financial data and reports, as well as any non-public information that might be of use to competitors or harmful to ACI, ACI's customers or Employees if disclosed.

It also includes information that suppliers, customers, and other business partners have entrusted to ACI on a confidential basis. Employees are required not to disclose confidential information even after employment ends. This information should not be shared inappropriately, including on blogs, personal websites, bulletin boards, and social networking sites. Confidential information may be inadvertently disclosed in casual or social conversations, or in an innocent post on a social networking site, and it's important to avoid such disclosures. In the event of any such disclosure, however, please promptly notify your manager.

ACI is obligated to protect the security and privacy of personal information collected by the Company. This includes adhering to global privacy laws. Employees may also have obligations under any agreements signed with the Company, including the Employee Invention and Confidential Information Agreement or the Sales Employee Invention and Confidentiality Agreement.

## **OPEN SOURCE SOFTWARE**

There is a wide variation in open source licenses and the obligations officers, Employees and the Company may have under those licenses. Involvement with open source software may potentially lead to a conflict of interest with ACI and inappropriate transfer of ACI's intellectual property rights.

Employees involved with, or who want to use, open source software are required to consult with their manager and to comply with ACI's open source participation requirements. If Employees have any questions about permitted uses of open source software, contact a member of the Legal department.

## **PROTECTION & PROPER USE OF COMPANY ASSETS**

Theft, carelessness, and waste of Company assets have a direct impact on ACI's profitability and should be avoided. Any suspected incident of fraud or theft should be immediately reported to your manager, or through the process described in the Helpline Policy.

## **EMPLOYEE PRIVACY**

Because ACI is a global organization with business processes, management structures, and technical systems that cross country borders, Employees acknowledge that, to run its business, ACI and its subsidiaries may transfer personal information about them to any of the countries where ACI does business.

While not all countries have data protection laws, ACI has global policies that are intended to protect information wherever it is stored or processed. For example, access to Employees' personal information is restricted to people who need to know.

Personal information is normally released to outside parties only with Employee approval, except that ACI and individuals may also release personal information to verify employment, to satisfy the legitimate requirements of a company or entity which is considering acquiring some of ACI's business operations, or for appropriate investigatory, business, or legal reasons.

Employees who have access to personal information must ensure that the information is not disclosed in violation of ACI's policies or practices. Personal items, messages, or information that Employees consider private should not be placed or kept anywhere in the workplace.

## **ARTIFICIAL INTELLIGENCE (AI)**

Artificial Intelligence (AI) is revolutionizing the payments industry, and ACI is committed to leveraging this technology responsibly and ethically. ACI's AI initiatives are designed to enhance efficiency, accuracy, and customer satisfaction while adhering to the highest standards of conduct.

ACI recognizes the transformative potential of AI and are dedicated to using it in ways that align with our core values and ethical principles. This includes ensuring transparency, avoiding biases, and respecting the privacy and rights of individuals. All AI systems and tools used within ACI must be designed and trained to minimize biases and ensure fair and unbiased decision-making.

ACI is committed to complying with all relevant laws and regulations governing the use of AI along with applicable regulations that govern data protection, intellectual property, and data governance. Employees must ensure that AI applications and tools are used in compliance with these regulations and any concerns or potential violations immediately reported to your manager, or through the process described in the Helpline Policy.

## **ELECTRONIC COMMUNICATIONS AND INFORMATION SECURITY**

The Company's technology assets are important tools in conducting day-to-day business. Employees must understand that all documents and communications stored or transmitted using the Company's

technology resources are assumed to be business-related, and Employees do not have a recognized expectation of privacy as to such information, whether or not it is marked as “personal,” “private” or “confidential.”

## **ANTI-CORRUPTION/ANTI-BRIBERY**

In compliance with global bribery and corruption laws, in particular the US 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 in order to obtain or retain business. Employees cannot promise, offer, accept, or deliver to any foreign or domestic government employee or official any gift, favor, or other gratuity that would be illegal. These are laws that provide significant civil and criminal penalties if an Employee or the Company is found to have violated them. See the ACI Anti-Corruption Policy for more detailed requirements and prohibitions.

## **ANTI-BOYCOTT**

U.S. law prohibits ACI, and its subsidiaries and affiliates and their agents, from complying with or supporting a foreign country’s boycott of a country which is “friendly” to the United States. ACI is also required to report promptly to the U.S. Government any requests to support a boycott or furnish information concerning a boycott.

If Employees hear of a boycott or receive a request to support a boycott or to provide information related to a boycott, they should contact their manager, or the Chief Legal & Risk Officer.

## **ANTI-SLAVERY**

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 its business and in its approach to preventing modern slavery throughout its supply chains.

If Employees believe or suspect that an act has occurred, or may occur, that could constitute a form of modern slavery, or have any concern regarding the general working conditions within any tier of ACI’s supply chains, they should report their concerns in accordance with the Anti-Slavery Policy.

## **EXPORT, IMPORT AND SANCTION LAWS**

International transactions are subject to a variety of laws and regulations such as limits on some types of exports and imports, or restrictions on doing business with certain individuals or entities. These rules prohibit certain transactions and/or impose licensing or reporting requirements.

It is important for Employees to protect themselves and the Company by understanding these restrictions. Export laws cover more than just physical shipments. They also cover transfers of technical data, software or technology, or the provision of services over the internet, an extranet or an intranet; application development and delivery; e-business and e-services activities and technical assistance abroad. All involve activities that are subject to U.S. and other country export laws. ACI must comply with all export regulations and requirements.

There may be import implications in activities such as development process activity requiring international sourcing. Many countries restrict the export or import of “dual-use” items, which are items that have both a military and commercial use. Examples include encryption technology, certain high-end computers and some kinds of telecommunications equipment (e.g. satellite telephones).

Employees must consult with the Legal department before proceeding with any international transaction, shipment or import that may be covered by these laws.

## **FINANCIAL INTEREST IN OTHER COMPANIES**

A conflict can arise if Employees have a financial interest in partners, competitors or vendors of the Company. A financial interest might include an investment in a partner/competitor company, or a family member's stock plan at a company that does business with ACI. Employees are responsible for making sure that their investments in – or relationship with – other companies do not cause a real or apparent conflict between their personal interests and the Company's interests.

## **SERVICES TO OTHER COMPANIES**

In their free time, Employees may wish to perform services for another company, such as helping with a family member's new business, charity or serving on a board of directors. Any outside service should not conflict with an Employee's duties to the Company.

## **POLITICAL ACTIVITIES**

Employees are free to engage in personal volunteer political activity and contribute personal resources to candidates and parties as permitted by law. Employees may not, however, use Company resources (e.g., money, supplies) for personal political activities.

## **RAISING CONCERNS OR REPORTING ILLEGAL OR UNETHICAL BEHAVIOR**

In order to encourage good faith reports of illegal or unethical behavior (including violations of this Code), ACI has implemented the Helpline Policy. Any violation of this Policy should be reported via the process detailed in the Helpline Policy.

## **CODE OF ETHICS FOR THE CEO & SENIOR FINANCIAL OFFICERS**

The Chief Executive Officer, the Chief Financial Officer, the Controller, the Head of Finance, the Head of Accounting and persons performing similar functions (each individually, a "Senior Financial Officer" and collectively, the "Senior Financial Officers") of ACI have special roles to adhere to ethical conduct and integrity generally, and to promote accurate, fair and timely reporting of ACI's financial results and condition and other information ACI releases to the public market and includes in reports filed with the Securities and Exchange Commission ("SEC"). Because of these special roles, the Senior Officials are bound by the following additional Code of Ethics (this "Senior Financial Officer Code") in the performance of their duties on behalf of ACI:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships, including disclosure to the Chairperson of the Audit Committee of any material transaction or relationship that reasonably could be expected to give rise to such a conflict.
- Provide information within the scope of your duties in a manner which promotes full, fair, accurate, timely, and understandable disclosure in reports and documents that ACI files with, or submits to, government agencies and in ACI's other public communications.
- Act in good faith in order to promote ACI's compliance with applicable rules and regulations of foreign, federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
- Act in good faith, responsibly, with due care, competence, and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated.

- Respect the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose it, and not use confidential information acquired in the course of one's work for personal advantage.
- Proactively promote and be an example of ethical behavior.
- Achieve responsible use of and control over all assets and resources employed or entrusted.
- Promptly report to the person or persons identified below any conduct that the individual believes to be, or would give rise to, a violation of this Senior Financial Officer Code.

Each Senior Financial Officer will be held accountable for his or her adherence to this Senior Financial Officer Code. Failure to comply with this Senior Financial Officer Code, including reporting any suspected violations, may result in disciplinary action, up to and including termination of employment. Violations of this Senior Financial Officer Code may also constitute violations of law and may result in civil and criminal penalties for the Senior Financial Officer and/or the Company.

Any suspected violation of this Senior Financial Officer Code shall be reported to the Chief Legal & Risk Officer of ACI or the Audit Committee of the Board of Directors. Alternatively, suspected violations of this Senior Financial Officer Code may be reported pursuant to the Helpline Policy.

## 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

All Employees are expected to comply with all of the provisions of this Code, and the Company recognizes the need for this Code to be applied equally to everyone it covers. The Code will be strictly enforced throughout the Company and violations will be dealt with immediately. Violations of the Code that involve illegal behavior will be reported to the appropriate authorities. Failure to adhere to this Code may result in disciplinary action, varying from reprimand to dismissal.

Retaliation against any employee for good faith reporting of violations of this Code is strictly prohibited. Any such retaliation will be treated as a serious violation of this Code.

## POLICY EXCEPTIONS

Only ACI's Board of Directors or a committee of the ACI Board of Directors may waive a provision of this Code for ACI executive officers or directors. Any such waiver granted, along with the reasons for the waivers, will be publicly disclosed by appropriate means. Complying with this Code by obtaining permission where required will not be deemed to be a waiver of any provision of this Code for purposes of this paragraph.

Waivers of this Code for any other employee may be made only by the Compliance Committee, and then, it will only be approved under special circumstances.

## CONTACT

Any questions regarding interpretation of this Policy should be directed to Regulatory Compliance by emailing [Compliance-and-Ethics@aciworldwide.com](mailto:Compliance-and-Ethics@aciworldwide.com).

## DOCUMENT INFORMATION

**Policy Owner:** Megan Revels

**Policy ID:** ACIW-100

**Related Documents:** The following policies or handbooks are referenced

- ACI Helpline Report Protection Policy - Establishes protection of employees who have reported suspected wrongdoing to prevent retaliation in concert with whistleblower protection laws.
- Anti-Corruption Policy - Establishes prohibition of any unlawful business interactions involving bribery, improper payments, or corruption.
- Anti-Slavery Policy – Governs rules around prohibiting modern slavery in any company or supply chain interaction.
- Employee Handbook – Contains protocol on proper employee conduct, including guidance on anti-harassment policies
- Stock Trading Policy – Covers trading of ACI securities by employees, contractors, consultants, and board members.
- Records Management Policy - Establishes the record retention period based on type of records and legal or compliance guidelines that dictate the length of time and disposal.