



Deluxe Corporation and Subsidiaries: Report Under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

(For the fiscal year ended December 31, 2025)

Introduction

Deluxe Corporation, together with its subsidiaries (collectively "Deluxe"),¹ hereby submits this joint report in compliance with the requirements set forth in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (hereinafter "the Act") for the fiscal year ending December 31, 2025. This joint report affirms Deluxe's commitment to preventing and reducing the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by Deluxe, or of goods imported into Canada by Deluxe.

In 2025, Deluxe took the following measures to prevent and reduce the risk of forced labour or child labour in its activities and supply chains:

- We reinforced our commitment to ethical business practices by requiring all suppliers to comply with the Deluxe Supplier Code of Conduct as a condition of doing business with us. This Code includes strict prohibitions on forced labour and child labour. We expect our suppliers and business partners to conduct their operations in a manner that reflects our ethical standards and aligns with our core values.
- We launched a new due diligence questionnaire for third-party suppliers and an enhanced inherent risk assessment intended to focus our due diligence efforts on the highest-risk areas of our supply chain.

Deluxe is committed to continuous improvement and transparency in its efforts to combat forced and child labour, and to ensuring that our business practices are conducted in an ethical and responsible manner.

Structure, Activities and Supply Chains

Deluxe Corporation is publicly traded on the New York Stock Exchange (NYSE) and headquartered in Minneapolis, Minnesota. We have subsidiaries in the United States (US), Canada, and India. Deluxe supplies products and services to financial institutions and small and medium-sized businesses primarily in North America. Deluxe's main business segments are the following:

¹ Deluxe entities covered by this report for the fiscal year ended December 31, 2025, are Deluxe Corporation, Deluxe Business Operations, Inc., Deluxe Small Business Sales, Inc., and NEBS Business Products Limited, as listed in the Appendix.



Merchant Services	<ul style="list-style-type: none"> • Electronic credit and debit card authorization. • Merchant in store, online, and mobile payment solutions. • Terminals and devices.
B2B Payments	<ul style="list-style-type: none"> • Payables as a service, including eChecks, Medical Payment Exchange and Deluxe Payment Exchange. • Automated receivables technology, including remittance and lockbox processing, remote deposit capture and cash application, as well as payment acceptance solutions.
Data Solutions	<ul style="list-style-type: none"> • Solutions for marketing business-to-business and business-to-consumer. • Web-based solutions, including financial institution profitability reporting and business incorporation services.
Print	<ul style="list-style-type: none"> • Printed business and personal checks. • Business forms and accessories, including envelopes, labels, stationery, and more. • Advertising specialties, promotional apparel, and print services.

Deluxe engages in manufacturing and distribution (wholesale and retail) activities primarily through its Print business segment.

Manufacturing and Distribution

Deluxe manufactures and distributes various office commodities and printed materials in the US and in Canada to businesses and retailers. Deluxe also distributes promotional items such as pens, check book covers, flasks, and other branded merchandise to business customers and directly to consumers in the US and Canada through its website.

Deluxe's main production facility in Canada is located in Midland, Ontario. It is owned and operated by NEBS Business Products Limited (NEBS), a Canadian subsidiary of Deluxe Corporation that primarily designs, manufactures, and distributes personalized business products for small and medium enterprises in Canada. Key manufactured products include checks, tax forms, stationery, holiday cards, file systems, and other office commodities.

Deluxe also manufactures and distributes Magnetic Ink Character Recognition (MICR) and image quality assurance testing hardware for global customers. Manufacturing operations related to this business segment are conducted in Deluxe's Waterloo, Ontario facility by a Canadian subsidiary of NEBS, Research Development & Manufacturing Corporation.

Importations and Supply Chain

Deluxe imports various goods into Canada in support of its manufacturing and distribution activities. Goods imported by Deluxe entities, including NEBS, originate primarily from the US, but also from outside of North America, including from China and Vietnam. The principal materials used in manufacturing our MICR and image quality assurance products are aluminum, steel, stainless steel,





paper, plastics, and corrugated and foam packaging, which we purchase from various sources in the US and Canada. We also purchase stock business forms, documents, and mailing materials from the US and Canada. At times, our Waterloo facility may be provided with promotional apparel manufactured by third parties in various jurisdictions, including the US, China, and Vietnam, among others.

Our direct suppliers include manufacturers of promotional materials, printers, website hosting providers, information technology (IT) suppliers, and consultants. These direct suppliers are spread across the globe, including in Africa, Australia, Asia, Europe, North America, and South America. In addition, we have entered into agreements with third-party providers for delivery services and information technology services, including telecommunications, network server, and transaction processing services, as well as various other services. As part of our commitment to continuous improvement, Deluxe supply chain mapping is ongoing.

Our Policies

Supplier Code of Conduct

Deluxe is committed to upholding high standards of integrity, ethical conduct, and responsible business practices in its activities and supply chains. Our direct suppliers, including all entities that provide goods or services to Deluxe, are expected to adhere to our Supplier Code of Conduct and to extend these principles to their own employees and supply chains for the goods and services provided to Deluxe.

The Supplier Code of Conduct is contractually binding on our suppliers through purchase terms and master service agreements. We require suppliers to maintain full compliance with all laws, regulations, and company requirements applicable to their business and in doing business with us, including complying with the spirit of our Code of Ethics, which is described further below.

The Supplier Code of Conduct outlines our expectations in the following key areas: labour and human rights, health and safety, the environment, and ethical business practices. It specifically prohibits child labour and forced labour in the following terms:

Freely Chosen Employment

Suppliers must not use any form of slave, forced, bonded, indentured, involuntary prison labor, or human trafficking. This includes transporting, harboring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

Child Labour

Suppliers must not use any form of child labor in the production or distribution of their goods or services. A “child” is any person under the minimum legal age for employment where the work is performed, under the age of 15, or under the age for completion of compulsory education, whichever is higher.

Deluxe reserves the right to conduct ad hoc audits of our suppliers as part of our terms and conditions of purchase. If we determine that a particular supplier or facility does not comply with the Supplier Code of Conduct, we will strive to work with the supplier to develop and implement an appropriate





corrective action plan by documenting risks and assigning timelines for remediation. Depending upon the circumstances, Deluxe may elect to end its relationship with a supplier at any time for materially failing to adhere to the Supplier Code of Conduct.

The Supplier Code of Conduct was reviewed and updated in 2025 and is reviewed annually with updates made as needed. It is publicly [available on the Deluxe supplier information website](#).

Code of Ethics

Deluxe maintains a Code of Ethics which outlines the principles and expectations for ethical conduct within the organization. The Code of Ethics specifically prohibits the use of child labour, forced labour, or human trafficking in Deluxe's workforce and by its third-party vendors and suppliers. The Code of Ethics applies to all members of the Deluxe community, including employees, executive leadership, board members, contractors, and others in similar positions across all Deluxe Corporation subsidiaries and affiliates. It is designed to serve as a real-world guide for navigating challenging situations, complying with laws, regulations, and company policies, and upholding Deluxe's commitment to integrity and ethical business practices. The Deluxe Code of Ethics is structured around our long-standing commitment to "Doing Well by Doing Right" and conducting business with honor and integrity.

The Code of Ethics covers interactions with customers, employees, third parties, and shareholders, and underscores our commitment to ethical conduct across all facets of our operations. The Code of Ethics outlines the responsibilities of Deluxe community members to live by the company's values, understand and follow the code, adhere to laws and internal policies, act in the company's best interests, and speak up about any concerns or violations. The Code of Ethics also directs Deluxe employees to ensure that vendors and suppliers comply with the Deluxe Supplier Code of Conduct. Deluxe leaders are specifically charged with fostering an ethical culture, being approachable for discussions about ethical concerns, taking action on reported issues, preventing retaliation, and seeking advice when needed.

The Code of Ethics is reviewed annually and updated as needed. The Code of Ethics is publicly [available on our investor relations website](#) in English, French, and Spanish.

Human Rights Policy

Deluxe is dedicated to promoting and safeguarding human rights in every facet of its operations. We recognize that our business activities can impact a wide range of stakeholders and are committed to conducting operations in a manner that aligns with the *UN Guiding Principles on Business and Human Rights*.

Deluxe has implemented a Human Rights Policy to anchor our commitment to uphold and respect the human rights of all individuals, both within and outside our organization. The policy applies to our operations and business activities in the US, Canada, and India.

Deluxe's Human Rights Policy recognizes among its guiding principles that its employees are entitled to fair wages, reasonable working hours, and safe working conditions. This stance extends to a strict prohibition against exploitative labour practices, including child labour, forced labour, bonded labour, and human trafficking of any kind. The policy also aims to hold our suppliers and business partners to





the same human rights standards, by requiring them to respect and uphold human rights principles in their operations. This commitment is operationalized through our Supplier Code of Conduct, which mandates suppliers and business partners to treat individuals fairly and with respect, and to ensure safe, secure, and healthy working environments for all workers.

Our Human Rights Policy expectations are enforced through several mechanisms, including human rights due diligence, compulsory training for all our employees and contractors, as well as a confidential grievance mechanism for employees, stakeholders, and affected parties to raise concerns related to human rights violations. The Human Rights Policy is reviewed annually and updated as needed. Deluxe is committed to taking swift and appropriate corrective measures and providing remedies to affected individuals, demonstrating a comprehensive and proactive approach to implementing its human rights policy across all areas of its business.

Due Diligence Processes for Modern Slavery and Human Trafficking

To assess and address the risks of modern slavery and human trafficking within Deluxe's operations and those of its direct suppliers, Deluxe does the following:

- We offer multiple reporting channels for compliance, ethical, or legal concerns, including a Compliance & Ethics hotline with telephone and email options.
- We require third parties to complete a questionnaire as part of the onboarding process. The questionnaire requires potential suppliers to acknowledge and agree to comply with Deluxe's Supplier Code of Conduct. The Supplier Code of Conduct is also incorporated by reference into our contracts with third parties.
- We retain the right to conduct audits of direct suppliers as part the Deluxe onboarding and annual review process.
- In 2025, we launched a new dedicated Third-Party Risk Management (TPRM) software solution to improve tracking and risk assessment.

The Risks of Forced Labour or Child Labour

Deluxe acknowledges the inherent risks of forced and child labour within its supply chains and is dedicated to upholding ethical business practices. Deluxe did not identify any instances of forced labour or child labour in its supply chains in 2025. Deluxe received no reports of potential instances during 2025 through its Compliance & Ethics hotline, nor were any such reports made through the Deluxe Human Resources or Procurement departments. Because Deluxe did not identify any incidents of forced labour or child labour in 2025, it therefore did not take any remediation measures, and no measures were needed to remediate loss of income to vulnerable families.

While we are currently not aware of specific incidents involving forced or child labour in our direct operations or within the operations of our Tier 1 (direct) suppliers, we acknowledge the broader industry and geographic risks. Parts of Deluxe's business and supply chains that carry a general risk of forced or child labour include manufacturing processes, raw material sourcing, and certain geographic regions





known for less stringent labour laws and enforcement. Risk areas often involve the more remote parts of Deluxe's supply chains, where oversight is more challenging and labour practices may vary. Deluxe is committed to ongoing monitoring and due diligence to identify, prevent, and address risks related to forced and child labour across its supply chain. In 2025, Deluxe launched a new software solution to support the identification, tracking, and mitigation of third-party risks, including those linked to forced and child labour within its supply chains and operation. Over the course of 2026 and beyond, Deluxe will continue to enroll its third-party vendors in this system.

Measures Taken to Prevent and Reduce Risks

Deluxe has undertaken several initiatives to prevent and reduce the risk of forced and child labour in its operations and supply chains, both within Canada and internationally.

Supplier Code of Conduct and Contractual Requirements

A cornerstone of our approach to reducing the risk of forced or child labour in our supply chains is the requirement that our direct suppliers comply with Deluxe's Supplier Code of Conduct. This code is incorporated into our contracts with third parties, including temporary labour agencies, and direct suppliers are required to certify compliance in the terms and conditions of each purchase order. This ensures that our values and expectations regarding labour practices are clear and binding for all of our business partners.

Human Rights Policy Training

Deluxe maintains a Human Rights Policy, as discussed above. This policy, which includes provisions related to labour standards and the prohibition of forced and child labour, aligns with our commitment to upholding human rights across our operations.

All Deluxe employees receive mandatory training on human rights through a module in the Code of Ethics training. This employee training covers key topics such as human rights, labour standards, and the identification of red flags related to forced and child labour, using practical examples and visual aids to enhance understanding and awareness. The training module is reviewed annually and updated as needed. Completion of this training is monitored and required for job performance, and new employees were required to complete this training within 90 days of their start date in 2025. During 2025, 79% of Deluxe staff completed the training, including 100% of Human Resources staff, 100% of Compliance staff, and 86% of Procurement staff.

Child Protection Processes

As part of its hiring practices, Deluxe requires verification of employee eligibility to work, including age eligibility, in accordance with applicable legal requirements. These practices are supported by standard onboarding and employment verification processes designed to ensure compliance with local labour laws and to prevent unlawful or exploitative employment practices.

Deluxe's expectations regarding the prohibition of child labour extend to its suppliers and business partners through the Supplier Code of Conduct, which expressly prohibits child labour in the production





or provision of goods and services. Suppliers are expected to implement appropriate measures within their own operations to comply with these requirements.

Grievance Mechanism

The Deluxe Compliance & Ethics hotline is a dedicated channel through which internal and external stakeholders, including employees and suppliers, can report any concerns regarding Deluxe policies, including the Human Rights Policy, Code of Ethics, and Supplier Code of Conduct. The hotline allows for anonymous reporting, providing a secure and confidential means for individuals to voice concerns without fear of retaliation. Deluxe closely monitors all issues reported through this hotline and conducts prompt investigations where appropriate. This process includes looking into potential legal violations, ensuring that the identity of the reporter and the fact that a report has been made are kept confidential to the extent possible while allowing for a thorough investigation.

Effectiveness Assessment

Deluxe acknowledges that continuous improvement is essential. We are committed to further strengthening our due diligence processes, assessing risks more effectively, and taking targeted actions to address any issues identified. Deluxe has implemented several measures described in this report intended to prevent and reduce the risk that forced labour or child labour is used in our activities and supply chains. Deluxe also continues to advance its TPRM program and supply chain transparency capabilities.

Approval and Attestation

Reviewed and approved by the Deluxe Corporation Board of Directors, the governing body for all entities represented in this report, on April 23, 2026.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, I, in the capacity of President, Chief Executive Officer, and member of the Board of Directors, attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed in the Appendix. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year listed within this report.

I have the authority to bind the entities listed in the Appendix.

Barry C. McCarthy

President, Chief Executive Officer, and member of the Board of Directors
April 23, 2026



Appendix

Reporting Entities

- Deluxe Corporation
- Deluxe Business Operations, Inc.
- Deluxe Small Business Sales, Inc.
- NEBS Business Products Limited

Reporting Entities Structure:

