

# Supplier Code of Conduct

Doing Well by Doing Right

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## Introduction

Deluxe Corporation and its subsidiaries and affiliates (“Deluxe” or “we”) offer best in class products and services to our customers: financial institutions, small businesses, and consumers. In offering these products and services, we pride ourselves on conducting business ethically and with integrity. Conducting business in this manner is at the heart of the Deluxe story and is evidenced by the way we have embedded our Deluxe shared values into all that we do. With over 100 years of serving the needs of our customers, we continue to underscore the importance of “doing well by doing right” to both our employees and those with whom we do business.

The principles and expectations in this Supplier Code of Conduct (“Supplier Code”) apply to anyone supplying goods or performing services for or on behalf of Deluxe (“Suppliers”) and apply to all activities undertaken in connection with the provision of those goods and services. We expect our Suppliers to extend these principles to their own employees and supply chain with respect to goods and services provided to Deluxe. Suppliers must 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 Deluxe Code of Ethics which can be found on our company website.

## Deluxe Values

### » **Customers First**

We deeply understand and delight our customers by partnering with them to anticipate their needs, deliver on our commitments, and bring our expert perspectives and insights. Their success is our success.

### » **Earn Trust**

Our business and partnerships are built on trust and integrity—it is at the heart of what we do and guides our decisions. We always strive to do the right thing.

### » **Grit and Perseverance**

We are driven to succeed. By aligning employee and shareholder interests, we deliver meaningful results for all stakeholders.

### » **Innovation**

We create what’s next by collaborating with our stakeholders and each other. We actively seek to understand our partners’ needs to further our legacy of innovation and build the future together.

### » **Power of One**

As One Deluxe, we celebrate our differences, relentlessly pursuing a culture of mutual respect. We are stronger together because of our individual skills and experiences.



# Labor and Human Rights

We expect our Suppliers to treat people with respect and dignity and conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights. This principle is supported by the following elements:

## 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.

## Freedom of Association

We expect our Suppliers to respect the rights of workers, as set forth in local laws, and to facilitate the right to associate freely, join or not join labor unions, bargain collectively, seek representation and join work councils. Workers must be able to communicate openly with management regarding working conditions without retaliation, threat of reprisal, intimidation, or harassment.

## Employment Status

Suppliers may only employ workers who are legally authorized to work in their location and facility and are responsible for validating employees' eligibility-to-work status through appropriate documentation.

## Regular Employment

We expect our Suppliers to prioritize regular employment and strive to provide permanent and direct employment to the greatest extent possible. Suppliers should avoid the excessive use of non-regular employment practices such as fixed-term contracts or contracted labor. "Regular employment" means hiring workers as employees under legally recognized employment relationships.

## Wages and Benefits

Suppliers must pay workers according to applicable wage laws, including minimum wages, payment of overtime hours at a premium rate, and mandated benefits. Suppliers must, in a timely manner, provide workers an understandable wage statement that includes sufficient information to verify accurate compensation for work performed. Suppliers are prohibited from the use of wage deduction as a disciplinary measure. Suppliers are also expected to communicate with workers when overtime is required and the wages to be paid for such overtime.

## Working Time

Suppliers must not exceed maximum working hours set by law. A work week should not be more than 60 hours per week, comprised of 48 regular hours and a maximum of 12 hours of voluntary overtime. Workers should receive a rest period of at least 24 hours every seven days. Suppliers must strictly adhere to these requirements except in cases where local laws or worker's agreements explicitly define and permit exceptions.

## Child Labor

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.

## Non-Discrimination

We expect our Suppliers to provide equal employment opportunities to employees and applicants for employment without regard to age, sex, race, color, ethnicity, citizenship, national origin, sexual orientation, gender identity, creed, religious preference or belief, disability, marital/family status, or any other characteristic protected by law, so long as the essential functions of the job can be performed with or without reasonable accommodation.

## Respectful and Harassment-free Workplace

We expect our Suppliers to respect the people they employ and to offer a workplace that is free from harm, intimidation, harassment or fear. Suppliers must not engage in, condone, or tolerate physical, verbal, mental or sexual harassment against or among their workers. Suppliers are expected to treat people with dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

## Use of Drugs and Alcohol

We expect our Suppliers to maintain a workplace free from alcohol and illegal use, possession, sale or distribution of controlled substances. Suppliers must not use, possess, purchase, or distribute illegal drugs or alcohol while working for or on behalf of Deluxe, or while on Deluxe property.

# Health and Safety

**We expect our Suppliers to provide a safe and healthy working environment. This principle is supported by the following elements:**

## Occupational Health and Safety

We expect our Suppliers to ensure that their activities are safe for the health of their employees, their own contractors, the local community, and users of their products and services. Suppliers must comply with applicable safety and health laws, regulations, policies, and procedures.

Suppliers must have procedures and systems in place to prevent, manage, track, and report occupational injury and illness including provisions to encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of employees to work.

## Emergency Preparedness and Response

Suppliers must identify and assess emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures. Such plans and procedures should focus on minimizing harm to life, the environment, and property. Suppliers must review and, if appropriate, update such plans and procedures annually or more frequently, if necessary.

## Industrial Hygiene

Suppliers must identify, evaluate, and control any worker exposure to chemical, biological, and physical agents. Engineering or administrative controls must be used to control overexposures. When hazards cannot be adequately controlled by such means, workers must be provided with and use appropriate, well-maintained personal protective equipment.

## Physically Demanding Work

Suppliers must identify, evaluate, and control employee exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

## Machine Safeguarding

Suppliers must evaluate production and other machinery for safety hazards. Physical guards, interlocks, and barriers must be provided and properly maintained where machinery presents an injury hazard to employees.

## Health and Safety Communication

Suppliers must provide workers with appropriate workplace health and safety training in a language workers easily understand for all identified workplace hazards, including but not limited to, mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information must be clearly posted in all facilities or placed in locations identifiable and accessible by workers. Health and safety training must be provided to all workers prior to beginning work and regularly thereafter. Workers should be encouraged to raise health and safety concerns.



# Environment

**We expect our Suppliers to operate with sustainable business practices and mindful, responsible use of environmental resources, including engaging in reuse and recycle programs, and where possible, avoiding the use of hazardous materials. This principle is supported by the following elements:**

## Environmental Authorizations

Suppliers must comply with all applicable environmental regulations, laws, codes, and other governmental requirements and authorizations. Suppliers must maintain and follow all associated operational and reporting requirements of required environmental permits, licenses, information registrations, and restrictions.

## Sustainability

Suppliers must minimize the unnecessary use of materials, resources, and energy to reduce their environmental footprint. When requested by Deluxe, Suppliers must provide documentation highlighting their progress on clean manufacturing processes, waste minimization, sustainable practices, and environmental performance standards.



# Ethical Business Practices

**We expect our Suppliers to conduct their business in an ethical manner and act with integrity. This principle is supported by the following elements:**

## Compliance with Law

Suppliers must comply with applicable laws and regulations in the countries and jurisdictions in which they operate. The Supplier Code of Conduct applies to activities in the locations where Suppliers' goods are produced, where any related services are performed, and where the goods enter the supply chain. Where differences or conflicts in standards arise, the highest standard will apply.

## Accurate Books and Records

Suppliers must maintain accurate and transparent books, records, and accounts to demonstrate compliance with applicable laws, regulations, and this Supplier Code of Conduct. All financial books and records must conform to generally accepted accounting principles. Suppliers must not hide, fail to record, or make false entries in any book or record.

## Anti-Corruption and Bribery

We expect our Suppliers to comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and all other applicable anti-corruption laws. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. Suppliers must refrain from offering any gifts, meals, entertainment, or hospitality to foreign or domestic government officials, political parties, candidates for public office, or other such persons to influence such persons or obtain or retain business. Suppliers must exercise due diligence to detect and prevent corruption in all business arrangements.

## Antitrust and Competition Law

Suppliers must comply with all domestic and international antitrust and competition laws and regulations to avoid any action that would illegally restrain or thwart the efforts of competitors. These laws prohibit practices in restraint of trade, such as price fixing, bid rigging, group boycotting, territory or customer allocation, and offering or taking bribes and accepting kickbacks.

## Gifts and Entertainment

We expect our Suppliers to compete on the merits of their products and services and not use the exchange of business gifts and entertainment, including cash and cash equivalents, to gain an unfair competitive advantage. In any business relationship, our Suppliers must ensure that the offering or receipt of any gift or entertainment is permitted by law and regulation; does not violate the rules and standards of the recipient's organization; is consistent with reasonable marketplace customs; and will not adversely impact the reputation of Deluxe. Suppliers may not offer any gift or entertainment with the intention of trying to influence the decision-making objectivity of a Deluxe employee.

## **Conflicts of Interest**

We expect our Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with us. We expect our Suppliers to notify all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between Deluxe's interests and the personal interests of our Suppliers or those of close relatives, friends or associates.

## **Confidential Information**

Suppliers requiring the exchange of confidential information with Deluxe are required to execute a confidentiality agreement ("Nondisclosure Agreement") with Deluxe in advance. Exchange of confidential information is limited to that necessary to fulfill contracted performance requirements. Suppliers must protect all confidential information, including personal information disclosed to or collected from or on behalf of Deluxe, and take all necessary technical, procedural, and administrative safeguards to prevent its unauthorized access, use, disclosure, or loss; including an unauthorized communication and/or publication of information acquired from or on behalf of Deluxe. Suppliers must immediately report unauthorized use, disclosure, or loss of Deluxe related confidential information, whether inadvertent or not, through the Deluxe Support Center at 1-800-328-9500, which is available 24/7.

## **Data Privacy and Security**

Suppliers must comply with all applicable data privacy laws, regulations, and contractual obligations when handling confidential information. This includes, but is not limited to, statutes requiring notification of breaches or unauthorized disclosure of confidential information, U.S. state privacy laws, Canada's Personal Information Protection and Electronic Documents Act (PIPEDA), the European Union's General Data Protection Regulation (GDPR), and the United Kingdom's GDPR. Suppliers may not retain, use, or disclose personal information (or such other equivalent definition prescribed by law, e.g., "personal data") for any other commercial purpose beyond the direct business relationship.

Suppliers must comply with applicable Deluxe Data Privacy and Security policies with respect to collection, use, or retention of confidential information. Suppliers must have a demonstrable information security program that protects it and Deluxe from information/cyber threats in accordance with good industry practice (e.g., NIST, SANS, ISO27001/02) and applicable industry requirements.

## **Trade Compliance**

Suppliers must comply with all applicable import and export controls, sanctions and other trade compliance laws, regulations, and rules of the United States and of any country where such transactions occur.

## Conflict Minerals

We expect our Suppliers to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement supply chain due diligence processes to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries.

## Identification of Toxic Chemicals

We expect Suppliers to ensure that all products provided to Deluxe comply with California's Proposition 65 (the California Safe Drinking Water and Toxic Enforcement Act of 1986, California Health and Safety Code 25249.5, et seq.). For products that require a Proposition 65 warning, Suppliers must provide the warning to Deluxe at the time of the sale and inform Deluxe in writing whether warnings must be provided by point-of-sale signage. If Deluxe does not receive written notice to the contrary from the Supplier by the time of sale, Deluxe may assume that the Supplier's products comply with Proposition 65 and do not require a warning.

# Noncompliance and Reporting Issues

To ensure compliance with the Supplier Code of Conduct, Deluxe reserves the right to perform ad hoc audits. 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. 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.

Suppliers may ask questions or report any concerns regarding compliance with this Supplier Code of Conduct to Deluxe by contacting the Deluxe Ethics & Compliance Hotline, available 24/7, at 1-800-231-1757. Suppliers may also access the hotline via the web at [www.deluxe.com/hotline](http://www.deluxe.com/hotline) or via email at [ethics@deluxe.com](mailto:ethics@deluxe.com). Suppliers can report anonymously on the Deluxe Ethics & Compliance Hotline.

Deluxe closely monitors all issues reported and conducts prompt investigations where appropriate, particularly in cases involving potential violations of the law. Whether made anonymously or not, the identity of the reporter and the fact that a report has been made will be kept confidential to the extent possible while still allowing a thorough investigation to proceed. Deluxe will provide a response to the reporter where appropriate.

For additional Supplier resources, please visit the Deluxe Supplier Information webpage at <https://www.deluxe.com/about/supplier-information/>.