



ETHICS AND COMPLIANCE STANDARDS FOR DELUXE SUPPLIERS

IT IS CRITICAL THAT ALL DELUXE SUPPLIERS SHARE OUR COMMITMENT TO BUSINESS WITH INTEGRITY.

These standards apply to individuals/organizations that provide services, raw materials, finished goods, or other products ("Suppliers"). Where they exist, the Supplier's own written ethics and compliance standards may replace these Standards if they are consistent with these standards and are incorporated into a written agreement between Deluxe and Supplier.

ADHERANCE TO APPLICABLE LAWS & REGULATIONS

- Suppliers must comply with the applicable laws, rules, regulations, and ethical standards of the country in which they operate, and of the U.S., and these Standards.

PROHIBITION AGAINST BRIBES, KICKBACKS, UNLAWFUL PAYMENTS, AND OTHER CORRUPT PRACTICES

- Suppliers are prohibited from illegally directly or indirectly paying anything of value to a government official or other party in a prospective or existing business relationship in order to:
 - Win or retain business or to improperly influence the act or decision of any government official, political party, candidate for political office, or official of a public international organization;
 - Gain an improper advantage; or
 - Illegally influence the action of any individual, customer, company, or company representative.
- Suppliers are required to keep accurate and transparent records that reflect actual transactions and payments.
- While Deluxe observes local business customs and market practices, neither Deluxe nor any Supplier shall participate in any corrupt, unethical or illegal practices.

ACCURACY OF BUSINESS RECORDS

- All financial books and records must conform to generally accepted accounting principles.
- Supplier records must be accurate in all material respects.
 - Records must be legible, transparent, and reflect actual transactions and payments.
 - Do not hide, fail to record, or make false entries.

FAIR COMPETITION AND ANTITRUST

- Suppliers must comply with all applicable laws and regulations regarding fair competition and antitrust.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- Suppliers requiring the exchange of confidential information with Deluxe are required to execute a confidentiality agreement with Deluxe in advance.
- Exchange of confidential information is limited to that required to fulfill contracted performance requirements.
- Suppliers shall not share with others not having a Deluxe approved need to know, or use for their own purposes, Deluxe's intellectual property or confidential information or any other information that they acquire with respect to Deluxe's business (including information developed by Suppliers and information relating to products, customers, suppliers, pricing, costs, know-how, strategies, programs, processes, and practices).
- Suppliers must immediately report unauthorized use, disclosure, or loss of Deluxe's confidential information, whether inadvertent or not, through the Deluxe Support Center at 1-800-328- 9500 or in Minnesota at 651-483-7605, which is available at any time of the day.

DATA PRIVACY AND SECURITY

- Suppliers must abide by applicable data privacy laws and regulations when handling confidential information including statutes requiring notification of breaches or unauthorized disclosure of confidential information.
- Suppliers must comply with applicable Deluxe Data Privacy & Security policies with respect to collection, use, or retention of confidential information.
- Suppliers must protect Deluxe Confidential information and assets against unauthorized access, loss, disclosure, alteration or destruction using administrative, technical, and physical safeguards required by applicable law.
- 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 or in Minnesota at 651-483-7605, which is available at any time of the day.
- Visit deluxe.com/privacy to learn about Deluxe's commitment to privacy.

EMPLOYMENT PRACTICES GUIDELINES

- Suppliers must treat Deluxe employees with dignity and respect.
- Suppliers must comply with all applicable employment laws and regulations including statutes prohibiting discrimination in the workplace.
- Suppliers shall not possess, use or sell illegal drugs on Deluxe property or perform their work while affected by alcohol, improperly used legal drugs, or illegal drugs.
- Suppliers will not produce or manufacture goods or services using forced or indentured child labor. Suppliers' regular full-time employees are to be at least 18 years of age. Suppliers must disclose the existence of part-time work, summer jobs, or apprenticeship programs for individuals under the age of 18 to Deluxe's management.
- Deluxe does not permit intimidation or hostility and will not tolerate any behavior from a Supplier that might harass, disrupt or interfere with another person's ability to work.

CONFLICTS OF INTEREST

- A conflict of interest arises when personal interests or activities influence, or appear to influence, the ability to act in the best interests of Deluxe. Some situations that could cause a conflict of interest include:
 - Having a significant financial investment in any company that competes, does business, or seeks to do business with Deluxe. A significant financial interest includes voting control, or an ownership of more than 1% of the outstanding capital of a business, or an investment that represents more than 5% of the investor's total assets.
 - Providing similar services to direct competitors of Deluxe, with access to confidential or competitive information.
 - When family members (or domestic partners, or those personally close to a Supplier) work for Deluxe, another Deluxe supplier, Deluxe customer or Deluxe competitor.
 - Suppliers must disclose any apparent or actual conflicts of interest to Deluxe management. If Deluxe management approves an apparent or actual conflict, the approval decision must be documented.

MOBILE DEVICES, ELECTRONIC MEDIA, INTERNET AND E-MAIL USE

In those circumstances where Suppliers have access to Deluxe's electronic environment (Intranet, e-mail, voicemail or other), Suppliers shall:

- Protect Deluxe's confidential information and electronic media;
- Encrypt or password protect data;
- Keep mobile devices with Supplier or locked when traveling;
- Comply with local data protection laws;
- Use these tools for Deluxe business purposes only; and
- Use these tools consistent with Deluxe's Acceptable Use of Information and Technology Policy including:
 - Do not knowingly download, view or forward materials of a discriminatory, harassing, threatening, sexual, pornographic, racist, sexist, defamatory or otherwise offensive nature. Electronic media must be primarily used for business purposes.
 - Do communicate protected information (personal or trade secret) in a way that recognizes the sensitivity of the information, possibility of unauthorized access, and compliance to local data protection laws. Suppliers will be responsible for keeping Deluxe-given password(s) secret.
 - Realize that documents, software, e-mails and other web pages could bring damaging computer viruses into Deluxe's network. Do not knowingly detach, decompress, run/launch or install any files or programs on Deluxe's systems or open attachments that have damaging computer viruses. Do not download or disseminate any material from the Internet unless the copyright owner has provided consent.
 - Adhere to the timing and methods for retention and elimination of Deluxe company data stored on electronic media.

TRADE COMPLIANCE

- Suppliers must comply with the letter and spirit of all applicable import and export controls, sanctions, and other trade compliance laws of the United States and the laws of the applicable country(ies) where the transaction(s) occur(s).

ENVIRONMENT, HEALTH & SAFETY

- Suppliers are expected to comply with all applicable laws and regulations regarding the environment, health and safety.
- Suppliers working with Deluxe or onsite at a Deluxe location must work in a way that assures their own safety and the safety of others and in compliance with applicable Deluxe and governmental environmental, health and safety requirements. Any emergencies that may impact Deluxe must be reported promptly.

SUSTAINABILITY

- Suppliers are expected to operate with sustainable business practices and mindful, responsible use of environmental resources.
- Suppliers working with Deluxe must minimize the unnecessary use of materials, resources and energy.
- Suppliers may be asked to provide documentation highlighting their progress on clean manufacturing processes, waste minimization, sustainable practices and environmental performance standards.
- Visit Deluxe.com for an overview of sustainability at Deluxe

GIFTS AND ENTERTAINMENT

Gifts and entertainment are not needed in order to conduct business with Deluxe and are highly discouraged.

- The following situations are always inappropriate and are expressly prohibited:
 - Giving a gift, entertainment, or preferred treatment with the intention of trying to influence the decision-making objectivity of a Deluxe employee.
 - Offering any gift, entertainment, or preferred treatment while involved in a current purchasing or contracting decision process. (RFI, RFQ, RFP).
 - Any gift of currency or other means of payment including “gift cards.”
 - Offering entertainment where the Supplier will not be present/represented (e.g., sports/event tickets).
 - Offering extravagant recreational outings, travel, or lodgings at Supplier sponsored events.
- On a rare and infrequent basis Deluxe employees may accept very modest gifts, entertainment, or other business courtesies if it helps improve the business relationship and they would be able to reciprocate in equal value.
- Deluxe employees are not permitted to solicit Suppliers for gifts including gifts to support charitable causes.
- Suppliers shall not offer an opportunity to purchase products, services, or financial interest to any Deluxe employees under terms not available to all Deluxe employees.

RESOURCES

- If you need additional information or guidance on these standards, or wish to report a potential violation, contact Deluxe’s Ethics & Compliance Hotline at 800-231-1757.
- Additional Supplier information can be found at Deluxe.com