

GLOBAL CODE OF BUSINESS CONDUCT

Table of Contents

OUR CODE IS BASED ON OUR CORE VALUES	3
WE ARE ACCOUNTABLE FOR PROTECTING SENSITIVE INFORMATION	
Confidential and proprietary information	4
Data security	4
Privacy	4
WE RESPECT THE LAW	
Import-export & trade law	5
Anti-corruption law	5
Competition law	6
Money laundering law	6
WE ACT WITH INTEGRITY WHEN CONDUCTING BUSINESS	
Competitive intelligence gathering	7
Responsible marketing	7
Personal relationships	7
Gifts & business entertainment	8
Outside employment	8
Business opportunities	8
Political activities	8
WE ARE ACCOUNTABLE FOR OUR ACTIONS AND TO OUR COMMUNITIES	
Environmental stewardship	9
Workplace safety and health	9
Labor practices and human rights	9
WE TAKE INITIATIVE TO RESPONSIBLY MANAGE CORPORATE ASSETS	
Protecting company assets	10
Intellectual property	10
Document retention	10
Delegated authority	10
WE DEMONSTRATE INTEGRITY THROUGH TRANSPARENT AND ACCURATE REPORTING AND HONEST COMMUNICATIONS	
Communicating with our customers	11
Accurate records	11
Speaking on the company's behalf	11
Social media	11
WE VALUE TEAMWORK AND OUR COLLEAGUES	
Non-discrimination	12
Harassment-free work environment	12
Non-retaliation	12
ASKING QUESTIONS AND RESPONDING TO CONCERNS	
Seeking guidance & reporting violations	13
Confidential reporting channels	13
Consequences for violating the code	13
How we investigate reports	13
Approvals & waivers	14
Annual compliance training	14
Annual acknowledgement of support	14



OUR CODE IS BASED ON OUR CORE VALUES

Sungard AS' Core Values are the foundation for our Global Code of Business Conduct (the Code). We are ACCOUNTABLE for our actions. Our INTEGRITY drives our choices and ethical behavior. We RESPECT the law. We take the INITIATIVE to be leaders, but we reach our goals through TEAMWORK.

This Code is a statement of the Company's expectations regarding personal and corporate conduct. The Code applies to all members of the Sungard AS team, including our Board of Directors and all employees, no matter where they may be located. Everyone is responsible for understanding the legal requirements that apply to their business units and areas of expertise and responsibility. While this Code should provide you with the appropriate framework for making ethical decisions, more specific day-to-day procedures are outlined in Sungard AS' policies, which are available in the Compliance and Business Ethics area of the Community.

If you are ever unsure whether a particular course of action is ethical, ask yourself the following questions:

- ▶ Is the action consistent with the Company's Core Values?
- ▶ Is the action legal?
- ▶ Does the action comply with the Code and our policies, procedures and guidelines?
- ▶ Will my colleagues, managers and the Company support my decision?
- ▶ Will the action harm Sungard AS' reputation as an ethical company?

If you are still not sure what to do, you should discuss the issue with your supervisor at your earliest opportunity. While that discussion will generally resolve or clarify most issues, you may also use any of the other reporting options described at the end of this Code to raise questions and obtain guidance.

Similarly, we expect our business partners and suppliers to share our commitment to acting ethically. Accordingly, our work with business partners and suppliers should reflect Sungard AS' Core Values and the principles of this Code.

For additional information, guidance and advice, read the Supplier Code of Conduct.

"Acting ethically and following our Code contributes to the Company's most important asset: a reputation for integrity."

**Patty Boujoukos,
Chief Compliance Officer**

Sungard AS' Core Values

- ▶ **Accountability**
- ▶ **Integrity**
- ▶ **Respect**
- ▶ **Initiative**
- ▶ **Teamwork**



WE ARE ACCOUNTABLE FOR PROTECTING SENSITIVE INFORMATION

We will deliver on the promises we make to our customers. Accordingly, we must be accountable for protecting our customers' information. Likewise, we have a responsibility to our colleagues and the Company to protect Sungard AS' confidential information.

Confidential and Proprietary Information: Information that the Company considers private, and which is not common knowledge outside Sungard AS, is considered confidential. Confidential information may include information concerning our customers, finances, pricing, business strategy and employees. Proprietary and trade secret information is information that the Company owns, develops, pays to develop, possesses or to which it has an exclusive ownership right.

Safeguard all confidential and proprietary information and never use it for your own personal gain. Ensure that third parties with whom you work sign confidentiality agreements before disclosing confidential and proprietary information to them.

It is vitally important that we safeguard the confidential information given to us by customers in the course of our business. Protect customer confidential information and use it solely to provide services to that customer and for no other purpose, including trading of stock, bonds or other securities.

For additional information, NDA forms, guidance and advice, read the Non-Disclosure Agreement FAQ.

Data Security: Keeping Sungard AS' and our customers' data safe strengthens our business by building trust between our customers, employees and business partners. We must protect all passwords, user IDs, access cards, and encryption or authentication keys. A breach of our systems could cause significant reputational and financial damage to Sungard AS and its customers.

For additional information, guidance and advice, read the Information Security Policy and the Information Security Handbook.

Privacy: We value your privacy as well as the privacy of our customers. Therefore, the Company is committed to complying with all applicable privacy laws. Accordingly, it is everyone's responsibility to ensure that any personal data that the Company possesses, stores or transfers on behalf of its employees or its customers is handled with the utmost care, in accordance with our agreements and in compliance with Sungard AS' legal obligations.

For additional information, guidance and advice, read the Company's Privacy Policies, the Overview of Sungard AS' Data Privacy Initiatives; for a comprehensive statement of the Company's standard for protection of Employee Information, read the Staff Privacy Notice.

"We must use the same care and diligence to protect our own confidential information as we do to protect our customers' data."

Josh Crowe,
Chief Technology Officer

Data Security

"Data security is an important issue to our customers and is core to our products and services. Our customers and business partners conduct business with Sungard AS because they trust that their most important data and information is safe and secure."

Shawn Burke,
Global Chief Security Officer



WE RESPECT THE LAW

By operating globally, we are required to adopt good corporate practices and comply with the legal, regulatory and institutional frameworks in the countries where we do business. Accordingly, employees must follow the laws and respect the customs in all countries and jurisdictions to which they travel and where Sungard AS does business. In particular, you should be aware of the following laws that impact our business:

Import-Export & Trade Law: As a multi-national company, we must comply with all trade laws, rules and regulations that impact our activities in the many different countries in which we operate. These laws apply to several aspects of our business, not just the physical shipment of products. For example, these laws may apply to Internet and Intranet technology transfers, travel across country borders with software or technical specifications or when information is shared by foreign nationals during visits to the United States. You should be aware of such laws, which may include embargos, export controls and anti-boycott regulations that apply whether an employee is based in the U.S. or another country.

EXAMPLE: An international customer would like to hire Sungard AS for certain consulting services. These services would be provided by video conference, e-mail correspondence and during two trips to the client's international headquarters. Even though Sungard AS is not providing physical goods to the customer, the intangible transmission of technology may trigger import-export issues.

For additional information, guidance and advice, read the Export Control and Economic Sanctions Compliance Policy and read the Export Control Management Procedures to be certain that you understand how the export laws apply to your work.

Anti-Corruption Law: We have zero tolerance for corruption. Regardless of local custom, industry practice or pressure to close a deal, we will not compromise our standards. We market our products on the basis of price, quality and service. No one is permitted to use inappropriate gifts, excessive entertainment or any improper means to influence customers or prospective customers.

Furthermore, bribing a government official is illegal in every country where we conduct business and doing so can result in reputational harm, significant fines and even criminal penalties against you and/or the Company.

EXAMPLE: Hoping to boost his new client transactions before the end of the fiscal year, a sales representative has purchased a number of World Cup tickets and made a "while they still last" offer to a number of leads that he feels need just a little extra motivation to close. Offering an extravagant gift like World Cup tickets in exchange for business is not acceptable under the Code.

For additional information, guidance and advice, read the Guide to Combating Bribery and Corruption.

FAQs

What is a bribe?

Bribery is giving money or something else of value to another person so that they will do something for you. A "kickback" is a form of bribery where money or something of value is given in exchange for services rendered.

Is it still a violation of the Code to give gifts when they are local custom and expected as part of doing business?

YES. Sungard AS' policies regarding gifts and entertainment apply equally in all countries regardless of perceived local customs.



Competition Law: We treat our competition fairly and comply with all laws designed to protect competition. Fair dealing and antitrust laws protect industry competition by generally prohibiting formal or informal agreements between competitors that seek to manipulate prices or unfairly impact competitors. Employees should avoid any conduct that could be interpreted as an illegal agreement with competitors (or suppliers) to restrict or diminish competition. Examples include price fixing, limiting production or allocating markets or territories between competitors.

EXAMPLE: An Account Manager's business contact has taken a job with a new company. Unfamiliar with her new company's provider of cloud computing services, the business contact asks about the existing provider's reputation. Seeing an opportunity to gain a new account, the Account Manager misleadingly informs his business contact that the existing provider has had a number of issues with data security and privacy and has a poor reputation for customer service. This is not acceptable competitive behavior and does not demonstrate one of the Core Values – Integrity. We always want to win and win fairly.

For additional information, guidance and advice, read the Fair Competition Guidelines.

Money Laundering Law: Employees may not attempt to conceal or "launder" illegally received funds or make the source of the funds appear legitimate. In addition, employees should be alert for and report any suspicious transactions, such as unusual cash payments and requests to accept or to make payments to a third party, or requests to send funds to a country other than where the buyer or seller are located.

EXAMPLE: A Senior Account Executive has been approached by a potential new client headquartered in Mexico. If the deal closes, it would be a significant "win" for both the business and the Senior Account Executive. Unfortunately, the company went through a due diligence process and a red flag was raised. Nevertheless, because she is anxious for the deal to close, the Senior Account Executive does not follow-up concerning the red flag. Six months later, Sungard AS receives a request for information and records from a U.S. government agency concerning its relationship with the Mexican company.

For additional information, guidance and advice, read the Anti-Money Laundering Policy.



WE ACT WITH *INTEGRITY* WHEN CONDUCTING BUSINESS

Relationships with our customers are built on the quality of the products and services we provide and the fact that we serve our customers honestly and with integrity. Having integrity requires that we embrace good corporate practices and never allow our personal interests to influence (or appear to influence) us during the performance of our duties for representing Sungard AS. You should always act honestly, be transparent and avoid conflicts of interest.

Competitive Intelligence Gathering: The Company does not permit the unlawful use of our competitors' trade secrets, and no one should attempt to improperly obtain proprietary or confidential information from another company.

For additional information, guidance and advice, read the Guidelines for Competitive Intelligence Gathering.

Responsible Marketing: Sungard AS is committed to complying with all legal and regulatory requirements relating to marketing of its products and services. We will market our products and services accurately and not mislead our customers by ambiguity, exaggeration, omission or otherwise by making false or misleading statements. We will earn our customers' business on our own merit and not by disparaging our competitors or by making false claims about their products and services. All public disclosures or statements made to the Media will be clear, contain verifiable facts and be made by authorized individuals and through authorized channels.

For additional information, guidance and advice, read the Marketing Guidelines, Media Engagement Policy and Social Media Policy.

Personal Relationships: We all have a duty of loyalty to the Company to further its goals, to work on behalf of its best interests and to avoid apparent and actual conflicts between our personal interests and those of the Company. Employees should not participate in any business decision that could benefit an individual with whom they have a close personal relationship. For example, Sungard AS does not allow employees to influence employment-related decisions that affect a relative. If you believe your participation in any business activities or decision making may give rise to a conflict of interest, inform your manager.

For additional information, guidance and advice, read the Guidelines for Avoiding Conflicts of Interest.

“Words like ‘integrity’ are often used in the business world. At the end of the day, however, it’s not our words that matter, it is our actions. With that in mind, incorporate the letter and spirit of this Code and Sungard AS’ Core Values into your actions every day”

Alfred Binford,
EVP Global Sales and
Solutions

FAQ

I received an e-mail containing confidential pricing information from a competitor we are bidding against on a big RFP. Can I use the information to improve our bid?

No. Based on the circumstances, it looks like the information was sent by mistake. If you receive confidential information under unusual circumstances, send the information back to the owner and delete all copies of it on your system. Do not share the information with any other employees.



Gifts & Business Entertainment: Giving and receiving modest gifts or entertainment can add value to our business relationships so long as they are appropriate for the situation, not offered to improperly influence a business decision and consistent with Sungard AS' policies. While the Company allows certain courtesies, entertainment, modest gifts and occasional meals for potential and existing customers or others involved with aspects of our business, such expenses must be reasonable, authorized, consistent with applicable law, in good taste and not regular practice. Lavish or excessive gifts or entertainment are prohibited. Extra care should be given if the recipient of the gift or entertainment is a government official. Oftentimes special rules further restrict the receipt of gifts and entertainment involving government officials.

For additional information, guidance and advice, read the Guidelines for Gifts and Entertainment, the Travel and Expense Policy and the Procurement Policy.

Outside Employment: Employees must have prior written approval from their supervisor and the SVP of Human Resources before providing services to another for-profit business. Employees must never provide services to a competitor while they are employed by Sungard AS.

For additional information, guidance and advice, read the Guidelines for Avoiding Conflicts of Interest.

Business Opportunities: Employees may not take advantage of business opportunities that they learn about through their work with Sungard AS or direct those opportunities to a third party unless Sungard AS has already been offered and declined the opportunity.

For additional information, guidance and advice, read the Guidelines for Avoiding Conflicts of Interest.

Political Activities: We respect the right of our employees to participate individually in the political process and to support candidates and political parties of their choice. For example, United States laws generally prohibit the use of corporate resources to directly or indirectly support or oppose candidates or political committees. Consequently, employees should keep their political activities separate from their work for Sungard AS and never use the Company name or resources (including time, property or equipment) for such activities.

For additional information, guidance and advice, read the Political Activity FAQ.

FAQs

What is a conflict of interest?

A situation in which a person has a private or personal interest which appears to influence his or her official duties.

What if I am unsure as to whether a conflict of interest exists?

It is important to understand that it is the appearance of influence that triggers a conflict of interest, not whether a person has actually been influenced. If you are at all uncertain about a potential conflict of interest, seek guidance from your supervisor or the legal department.



WE ARE ACCOUNTABLE FOR OUR ACTIONS AND TO OUR COMMUNITIES

Environmental Stewardship: Sungard AS is committed to environmental stewardship and protecting environmental assets for future generations. Employees should make every effort to employ environmentally positive and sustainable solutions. Additionally, employees must follow all environmental rules and regulations established by local, regional or national authorities.

Workplace Safety and Health: All employees are entitled to a safe, clean and healthy working environment that complies with all relevant rules, regulations and policies. To facilitate this type environment, employees must comply with all security policies and procedures and promptly report any concerns or security threats. Under no circumstances should anyone bring a weapon to work. Additionally, all business activities must be conducted with all necessary permits, approvals and controls.

Sungard AS will not tolerate illegal drug use or intoxication on Company premises or when employees are conducting Company business.

The Company's human resources policies are available internally in the Human Resources space in the Community under HR Policies.

Labor Practices and Human Rights: Sungard AS, and any third party working with Sungard AS, must comply with all labor laws in the jurisdictions where it operates. We seek to ensure that products and services delivered to customers or used in our business are sourced from suppliers, subcontractors and business partners that share our commitment to worker welfare and eradicating all forms of human trafficking in their operations and supply chains.

Please report any unsafe conditions to your management team or Human Resources representative, or contact Compliance.



WE TAKE *INITIATIVE* TO RESPONSIBLY MANAGE CORPORATE ASSETS

Protecting Company Assets: Employees must always exercise good judgment using Company assets. Personal use of company assets (such as telephones, computers, printers, faxes, etc.) should be minimal and not interfere with job performance. Promptly report to your immediate supervisor if you become aware of a theft or misuse of Company property or services.

For additional information, guidance and advice, read the Use of Company Property and Services FAQ.

Intellectual Property: Intellectual property (IP) is a valuable asset and includes our patents, trade secrets, trademarks, copyrights (including moral rights) and proprietary knowhow and information. Our IP should be safeguarded and may not be used for your personal benefit or the benefit of a third party. Likewise, we respect the IP rights of others and do not tolerate the unauthorized use of anyone else's IP. Before soliciting, accepting or using another company's IP, please make sure there is an appropriate licensing agreement in place or seek guidance from Legal or Compliance.

EXAMPLE: After months of hard work leading to a breakthrough in functionality, a Software Engineer copies her work onto a personal external drive and takes it home in order to make sure that she retains her work. This unauthorized use of Sungard AS' IP is a violation of the Code.

For additional information, guidance and advice, read the Intellectual Property and Software License FAQ.

Document Retention: Work product created by Sungard AS employees and information collected in furtherance of the Company's business are important Company assets. Accordingly, employees must always comply with all applicable records management policies and legal hold notices. These policies apply to all records created by Sungard AS, including hard copies, electronic files, emails, instant messages, video and backup tapes.

EXAMPLE: A diligent HR Specialist has a practice of keeping copies of all correspondence. In order to avoid losing emails due to automatic archiving and deletion, the HR Specialist saves work-related emails to a folder on his hard drive. The HR Specialist rarely deletes these emails. This practice likely violates Sungard AS' document retention policies.

For additional information, guidance and advice, read your Local Records Management Policy, Procedure and Schedule and be certain that you understand how this Policy may apply to your work.

Delegated Authority: It is your responsibility to know the limits of your authority to obligate the Company. Never act outside the limits of your delegated authority.

For additional information, guidance and advice, consult the Schedule of Authority and/or contact the senior financial officer in your location.

Test Your Knowledge

An employee's spouse is starting a new business. After regular working hours, the employee and her husband use the Company's computers, phones, printers and copy machines at the office. Is this behavior consistent with the Code?

No. While assisting her spouse after hours may not be interfering with her normal job duties, using Sungard AS' resources like this is more than incidental use of company assets and is not permitted.



WE DEMONSTRATE INTEGRITY THROUGH TRANSPARENT AND ACCURATE REPORTING AND HONEST COMMUNICATIONS

Communicating with our Customers: We treat our customers as we would expect to be treated ourselves. This means that we treat all customers fairly. All communications with customers should be honest, accurate and free from misrepresentations. We market and service our products with candor, integrity and transparency.

Accurate Records: We maintain books and records that are accurate and fairly stated. Every transaction we engage in must be correctly recorded. No unrecorded funds or assets may be created or maintained for any purpose. Creating false or misleading records of any kind is prohibited.

For additional information, guidance and advice, read the Financial Policy Manual.

Speaking on the Company's Behalf: Employees may not speak on behalf of Sungard AS unless they have been authorized to do so by their Senior Management. Employees permitted to speak on Sungard AS' behalf must always be truthful, accurate and respectful in their communications. Only authorized employees may speak to the Media on the Company's behalf and only after consultation with Public Relations.

EXAMPLE: A Senior Developer is asked to give a short industry presentation during a conference. The organizers of the conference have asked the Senior Developer to provide a short bio and description of his employer and job duties. Before proceeding, the Senior Developer should check with Senior Management.

For additional information, guidance and advice, read the Media Engagement Policy.

Social Media: While Sungard AS respects your personal privacy, it is important to remember that what you do or say through social media channels can be attributed to the Company, even when that is not your intention. Be careful when posting opinions on the Internet and never assume that your posts will be anonymous. Always act with integrity, honesty and fairness and never suggest your posts are made on behalf of the Company unless you receive authorization prior to posting.

For additional information, guidance and advice, read the Social Media Policy.

“Financial integrity is the responsibility of every employee, consultant and contractor at Sungard AS. We are all accountable for the company's assets and each of us should always act with Integrity by ensuring that we keep accurate records and comply with the company's internal controls. Maintaining good records is good for you, our business and our customers.”

Susan Lynch,
EVP and Chief Financial Officer



WE VALUE *TEAMWORK* AND OUR COLLEAGUES

We value a culture of respect and have a long-standing commitment to a work environment that respects the dignity of each individual. We encourage the free exchange of ideas among our employees and strive to create an environment where employees feel comfortable expressing their ideas and opinions. We will respect each member of our team's and other teams' perspective on how to grow our business and will be open and honest with one another. Put yourself in the shoes of a colleague who may be advocating a position or strategy different than yours. Even if you disagree, consider their alternative view and competing pressures. Think not what is best for your line of business or department but what is in the best interest overall for Sungard AS.

Non-Discrimination: The diversity of our employees is a tremendous asset. We base employment decisions on merit, job qualifications, performance and other business-related criteria and will make reasonable accommodations for the known physical or mental disabilities of an otherwise qualified applicant or employee. Sungard AS is committed to providing equal opportunity in all aspects of employment and will not tolerate discrimination on the basis of age, race, color, national origin, religion, sex, gender identity, sexual orientation or any other categories protected by law.

Harassment-Free Work Environment: Sungard AS will not tolerate harassment of any kind. We expect all employees to behave in a respectful and professional manner at all times and avoid engaging in a disrespectful, hostile, violent, intimidating, threatening or harassing manner towards one another.

Non-retaliation: Sungard AS will not tolerate retaliation against any employee who makes a report in good faith about a violation or possible violation of applicable law or the Code, or who participates in any investigation conducted internally or by a government enforcement agency. Employees who believe that they have been subject to retaliation should promptly report it using appropriate reporting channels listed below. The non-retaliation policy applies to:

- ▶ All complaints received by the Company about accounting, internal controls or auditing matters; and
- ▶ The reporting of information about any possible violation of applicable laws or the Code that the reporter reasonably believes has occurred, is ongoing or is about to occur.

The Company's human resources policies are available internally in the Human Resources space in the Community.

FAQ

What does non-retaliation mean?

Anyone who in good faith reports a possible violation of the Code or assists in the investigation of a reported violation will be protected by the Company. Similarly, any person who reasonably reports any possible violation of state or federal laws or regulations will be protected by the Company. The protection continues even if the report proves to be incorrect.



ASKING QUESTIONS & RESPONDING TO CONCERNS

Seeking Guidance & Reporting Violations: Employees may request guidance about how to comply with applicable law or the Code or report violations through any of the channels listed below.

Confidential Reporting Channels: You may ask questions about this Code, notify Sungard AS of a possible violation of this Code or discuss any concerns that you may have by taking any of the following steps:

- ▶ Contact your supervisor, or any other supervisor or manager, Human Resources or any other Company official including the Chief Compliance Officer, the General Counsel, the SVP of Human Resources or the Chief Financial Officer. You may contact any corporate officer by name or title by calling Company headquarters at 484-582-2000 or by e-mail
- ▶ You may also report concerns on a completely confidential and anonymous basis if you choose by calling the AlertLine toll-free at the numbers below, visiting the Sungard AS AlertLine at: www.sungardasalertline.ethicspoint.com, or emailing the Sungard AS Compliance Office at: AskASCompliance@sungardas.com

Belgium	0800-7-4524	Poland	00-800-151-0075
France	0800-91-0169	United Kingdom	0808-234-7291
India	000-800-100-1660	Canada	855-229-9415
Ireland	1-800-552-085	US	855-229-9415
Luxembourg	800-2-9718		

*Note it is not necessary to dial "353" when making this call. Simply dial whatever is necessary to get an outside line, followed by 1-800-552-085

- ▶ To contact the Sungard AS AlertLine outside North America or to reach the online reporting channels, visit www.sungardasalertline.ethicspoint.com

Consequences for Violating the Code: Violation of any applicable law or this Code is a serious matter. Any employee who compromises or violates any applicable law or the Code may be subject to disciplinary action, up to and including: termination; loss of certain employment-related benefits; and, if applicable, criminal or civil proceedings.

All Company incentive plans require compliance with applicable law and the Code as a condition of receiving any benefit under the plan. Any violation, no matter how small, may result in loss of incentive compensation, stock options, bonuses, or other awards.

How We Investigate Reports: Sungard AS investigates all reports of violations of this Code or any law or regulation. Employees must cooperate fully with all internal investigations, audits and government inquiries. Sungard AS will always be truthful in responding to an investigation or audit. We preserve evidence and records in

"Compliance is not just a legal term but a fundamental way we do business -how we engage with, support and keep our commitments to our colleagues and customers. Good Compliance is Good Business."

**Bill Price,
General Counsel and
Chief Administration Officer**

The Global Code of Business Conduct

The Global Code of Business Conduct is not a contract and is subject to change at any time, without notice, at the sole discretion of the Company. Except for the promise of protection from retaliation, none of the benefits, policies, programs, procedures or statements in the Global Code of Business Conduct are intended to confer any rights or privileges upon any Employee or other Company representative or entitle any Employee or Company representative to remain an Employee or representative of the Company.



response to litigation, investigations and audits whether ongoing or anticipated. Additionally, we protect the confidentiality of internal investigations unless otherwise instructed by the Company's Legal department to do otherwise. The Company will not tolerate any retaliation against an employee participating in an investigation.

Approvals & Waivers: When certain situations require permission from management or a supervisor, you should raise the issue promptly in order to permit sufficient time for the necessary review and approval. In rare circumstances, it may be appropriate to waive a provision of the Code. To seek a waiver, speak with your supervisor, who will consult with appropriate personnel to consider the request.

Members of the Board of Directors and executive officers who seek a waiver should address any such request to the Board of Directors or a designated committee of the Board. We disclose such waivers for directors and executive officers to the extent and in the manner required by applicable law, regulation or the stock exchange listing standard.

Annual Compliance Training: You are required to complete annual training and sign the accompanying Annual Acknowledgment of Support. Completion of this training is required and any failure to complete mandatory training in a timely manner can result in disciplinary action.

Annual Acknowledgement of Support: After completion of the annual training, all employees are asked to acknowledge their commitment to abide by the Code. In addition, employees will be asked to confirm that they are not aware of any violations of the Code or personal conflicts of interest. The Code sets forth general guidelines for all employees. However, employees should be aware of specific rules and policies, such as whistleblower policies, that apply in their country.



Sungard Availability Services Around the World

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About Sungard Availability Services

Sungard Availability Services is a leading provider of critical production and recovery services to global enterprise companies. Sungard AS partners with customers across the globe to understand their business needs and provide production and recovery services tailored to help them achieve their desired business outcomes. To learn more, visit www.sungardas.com or call 1-888-270-3657.

Trademark information

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