

An aerial photograph of a city skyline at sunset. The sky is filled with orange and yellow clouds, and the sun is low on the horizon. Several tall skyscrapers are visible, including a prominent one on the left. A large red banner is overlaid on the right side of the image, containing the title text.

Global Code of Business Conduct

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OUR CODE

Our 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 Sungard AS Community.

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

- Is the action consistent with the Company's values?
- Is the action legal?
- Does the action comply with the Code and our policies?
- 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.

We expect our business partners and suppliers to share our commitment to acting ethically. Accordingly, our work with business partners and suppliers should reflect the principles of this Code.

For additional information, guidance and advice, read the [Supplier Code of Conduct](#).

OUR COMMITMENT TO OUR CUSTOMERS

Providing Best Quality in Service, Products, and Value to Our Customers: We are dedicated to quality and take personal pride in all the products and services we provide. Our intense, acute focus on the needs of our customers continuously drives us to improve. Our continued success depends on exceeding the expectations of our customers and standing behind everything we do.

Fair Dealing: We will promote our products and services in a manner consistent with the customer's expressed financial needs and goals and provide sufficient information to allow them to make informed decisions voluntarily and without any form of coercion or undue influence.

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.

Responsible Marketing: 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.

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](#).

Protecting Customer Confidential Information: We deliver on the promises we make to our customers. Accordingly, we are responsible for protecting the privacy and security of our customers' information. We handle Customer Information responsibly and in accordance with our contractual commitments to our customers and in compliance with all applicable information privacy and security laws and company policies (including our records retention requirements). We maintain technical and organizational controls to ensure the privacy, confidentiality, integrity, and availability of Customer Information.

Refer to Sungard AS's [Privacy Policies](#) and [Information Security Policy](#) for additional guidance on the handling of customer confidential information.

OUR COMMITMENT TO OUR EMPLOYEES



Respect: We value a culture of respect and have a long-standing commitment to a work environment that respects the dignity of each individual. We promote 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 other’s perspective and will be open and honest with one another. We encourage you to put yourself in the shoes of a colleague who may be advocating a position or strategy different than your own. Even if you disagree, consider your colleague’s point of view and what is in the best interest overall for the Company.

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 based on age, race, color, national origin, religion, sex, gender identity, sexual orientation or any other categories protected by law.

Harassment-Free Work Environment: We will not tolerate harassment of any kind. We always expect employees to behave respectfully and professionally 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. Making false reports or claims that you do not believe are true is not acting in good faith. Employees who believe that they have been subjected 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 law 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](#) area of the Sungard AS Community.

“Good faith” is when you report or raise concerns that you honestly believe are true and are forthcoming with all information you have about your concerns.

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 of 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 health and safety policies are available internally in the Health & Safety area of the Sungard AS Community.

Personal Data Privacy: We value the privacy of our employees. Therefore, the Company is committed to complying with all applicable privacy laws. It is everyone's responsibility to ensure that any personal data that the Company possesses, stores, processes or transfers on behalf of its employees 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.

EXAMPLE: An employee recently got married and a colleague wants to send him a congratulatory card. The colleague asks the employee's manager for his home address. The manager says she cannot provide the employee's home address as it is considered personal information. Even though sending a card is a kind gesture, the manager has an obligation to protect the employee's personal information.

OUR COMMITMENT TO ACT ETHICALLY AND AVOID CONFLICTS OF INTEREST



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 Sungard AS. You should always act honestly, be transparent and avoid conflicts of interest.

Some situations involving potential conflicts of interest include:

- Outside employment or conducting non-Sungard AS business with a Sungard AS business partner, supplier, channel partner, or customer;
- Investing or having a direct or indirect material financial interest in a Sungard AS business partner, supplier, channel partner, customer, or competitor;
- A family or close relationship with a co-worker where there is direct supervision of or responsibility for such co-worker's work assignments, performance evaluations, pay, or benefits;
- Pursuing a business opportunity for yourself that you learned about through your work at Sungard AS;
- Serving on a board of directors or as advisor to an organization whose interests conflict with those of Sungard AS';
- An interest in buying or selling Company property. Selling anything to the Company or buying anything from the Company is not allowed unless prior approval of Company management is obtained;
- A direct or indirect opportunity to compete with the Company in the purchase or sale of technology, property rights, or other assets;
- A non-job-related activity that is substantial enough to interfere with the Employee's ability to devote appropriate time and attention to his/her job responsibilities with the Company.

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, or even the appearance of one, inform your manager. For additional information, guidance and advice, read the [Guidelines for Avoiding Conflicts of Interest](#).

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.

Frequent gifts or those of a higher value enhance the risk of being perceived as a conflict of interest or as provided for an improper purpose. Therefore, employees should limit how frequently they accept gifts, and should not accept any gift valued at more than US \$100. Employees should also decline business entertainment that is inappropriate in nature or excessive based on the context in which it is provided. For additional information, guidance and advice, read the [Guidelines for Gifts and Entertainment](#), the [Travel and Expense Policy](#) and the [Procurement Policy](#).

EXAMPLE: In some countries where Sungard AS conducts business, refusing a gift from a business associate is considered an insult. What should an Employee do if they are offered an expensive gift and they know it would be insulting to refuse it?

If it is customary to exchange gifts in the local culture and the Employee believes it will harm Sungard AS' business relationships if they do not accept a gift, they may accept the gift on behalf of the Company. They must then disclose the gift to their manager and complete the [Conflict of Interest Disclosure Report Form](#) to determine the appropriate next steps.

Outside Employment: Employees have a duty of loyalty to the Company, to further its goals and to work on behalf of its best interests. Employees must devote their full efforts to performing their job responsibilities and avoid any outside employment or obligation that conflicts or interferes with their ability to perform their job effectively. Employees must never provide services to any Sungard AS competitor. Executive and Management employees may not engage in any outside employment with any for profit business including their own business, without first disclosing and obtaining the approval of their Supervisor and the SVP of HR.

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](#).

Outside Director/Board Memberships, Officer, and Trustee Positions: While the Company encourages Employees to be active members of their communities, serving on the board of directors or an advisory committee of for-profit and non-profit organizations may present many opportunities for conflicts of interest. Before agreeing to become a member of the board of directors or an advisory committee of any for-profit organization, Employees should complete the [Conflict of Interest Disclosure Report Form](#) so that the Compliance team can determine if any relationship exists between our Company and the for-profit organization. To make sure activities relating to non-profit or community organizations do not create a conflict of interest or other problem, Employees should notify Compliance and their supervisor of their prospective membership before agreeing to the board service. Employees may not serve on the board of directors of a company or organization that raises the potential for a significant conflict of interest (e.g., certain competitive, supplier or customer relationships). If approved for serving on the board of directors of an outside company or organization, Employees may not conduct outside business during working hours or use Company assets or information in any work for another business.

For additional information, guidance and advice, read the [Guidelines for Avoiding Conflicts of Interest](#).

OUR COMMITMENT TO PROTECT COMPANY ASSETS

We have a responsibility to our colleagues and the Company to protect Sungard AS' company assets.

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, guidance and advice, read the [Global Non-Disclosure Agreements \(NDA\)](#).

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](#).

Information Security: Keeping Sungard AS' confidential information 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](#).

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.

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.

Personal Use of Company Assets: When using company assets, employees must always exercise good judgment. 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.

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.

OUR COMMITMENT TO TRANSPARENT AND ACCURATE REPORTING AND HONEST COMMUNICATIONS



Responsible Marketing: 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. Sungard AS is committed to complying with all legal and regulatory requirements relating to marketing of its products and services.

For additional information, guidance and advice, read the [Marketing Guidelines](#), [Media Engagement Policy](#) and [Social Media Policy](#).

Speaking on Behalf of the Company: 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.

For additional information, guidance and advice, read the [Media Engagement Policy](#).

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.

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](#).

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](#).

OUR COMMITMENT TO COMPLY WITH APPLICABLE LAW

Because we operate globally, we are required to adopt good corporate practices and comply with the legal, regulatory and institutional frameworks in the countries where we conduct 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](#) to be certain that you understand how export laws apply to your work.

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 a little extra motivation to close. Offering an extravagant gift like World Cup tickets in exchange for business is not acceptable under the Code.

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.

For additional information, please see our [Global Anti-Corruption Policy and related documents](#).

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 several issues with data security and privacy and has a poor reputation for customer service. This is not acceptable competitive behavior and does not demonstrate integrity. We always want to win and win fairly.

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 integrity. We always want to win and win fairly. For additional information, guidance and advice, read the [Fair Competition Guidelines](#).

Money Laundering: Money Laundering involves criminals, including terrorist organizations, disguising or channeling unlawfully obtained funds through legitimate businesses in order to conceal their criminal origin. 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 is located. For additional information, contact the Legal Department.

EXAMPLE: A Senior Account Executive has been approached by a prospective customer 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.

Insider Trading: We maintain trust by respecting financial laws, which means we do not trade based on material nonpublic information. In our work, we may become aware of material, nonpublic information about our Company or the companies with which we do business. Information is "**material**" if a reasonable investor would consider it important in deciding whether to buy or sell that company's securities. Information is "**nonpublic**" if it has not been broadly communicated to the investing public. Information is not considered public until the first business day after it has been disclosed to the public.

Trading or enabling others to trade the stock of our Company or any other company - such as a customer, supplier, competitor, potential acquisition or alliance - based on this information not only breaks trust, but is also illegal, violates Company policy, and is unfair to other investors. To use material non-public information in connection with buying or selling securities, including "**tipping**" others who might make an investment decision based on this information, is also unethical and illegal. and illegal.

OUR COMMITMENT 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.

For additional information, guidance and advice, read the [Sustainability Policy](#).

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.

For additional information, guidance and advice, read the [Supplier Code of Conduct](#).

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](#).

ASKING QUESTIONS, REPORTING & 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 have by taking 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.
- E-mail the Sungard AS Compliance at AskASCompliance@sungardas.com
- Report Concerns using the Sungard AS AlertLine where you can choose to remain anonymous. You can reach the Sungard AS' AlertLine online by visiting www.sungardasalertline.ethicspoint.com. Or, you may call the Sungard AS AlertLine toll-free using the numbers below:

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		

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 response to litigation, investigations, and audits whether ongoing or anticipated. Additionally, we protect the confidentiality of internal investigations unless 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 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.

Other Related Documents:

[How to Ask a Question or Express a Concern to Sungard AS](#)

SUNGARD AS AROUND THE WORLD

Global Headquarters

680 East Swedesford Road
Wayne, Pa 19087
484 582 2000

www.sungardas.com

Belgium

+32 (0)2 513 3618

India

(+91)20 673 10 400

Luxembourg

+352 357305-1

EMEA Head Office

Unit B Heathrow Corporate Park
Hounslow, Middlesex Tw4 6er
+44 (0) 800 143 413

www.sungardas.co.uk

France

+33 (0)1 64 80 61 61

www.sungardas.fr

Ireland

+353 (0)1 467 3650

About Sungard Availability Services

Sungard Availability Services provides managed IT services, information availability consulting services, and disaster recovery services.

To learn more, visit www.sungardas.com or call 1-888-270-3657

Trademark information

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