

Vendor Code of Conduct

Cass Information Systems, Inc. (Cass) is an organization with strong values of responsibility and integrity. We are committed to partnerships with vendors and suppliers (“Vendors”) that share our values and expect our Vendors to operate in compliance with the principles outlined in this Vendor Code of Conduct.

This Vendor Code of Conduct applies to any employee, agent, or other representative of a Vendor that provides goods or services on behalf of Cass. The provisions of this Code are in addition to those specified in any agreement between a Vendor and Cass.

Ethics

Vendors shall conduct business in an ethical and legal manner.

- Business Integrity: Vendors shall conduct business in accordance with the highest ethical standards and should have controls in place that prohibit and detect the misuse of company assets, corruption, bribery, improper gifts, extortion, embezzlement and even the appearance of conflicts of interest.
- Anti-Corruption: Vendors shall abide by all applicable anti-corruption laws and regulations of the countries in which they operate, including the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions.
- Confidential Information: Vendors with access to Cass’s confidential information should not disclose such information to any other person without our prior written consent.
- Intellectual Property: Vendors shall display the highest standard of respect, regarding the intellectual property rights of third parties and use technology only in a manner that protects, and is in compliance with, the owner’s intellectual property rights.
- Whistleblower Protection and Anonymous Complaints: Vendors shall protect the confidentiality of their whistleblower employees, prohibit retaliation, and, where legally permitted, provide an anonymous complaint mechanism for their employees to report grievances.
- Gifts, Meals and Entertainment: Vendors shall not provide any gift, meal or entertainment to a Company associate in any situation which might improperly influence, or appear to improperly influence, such associate’s decision in relation to a Vendor.

- Conflicts of Interest: We expect Vendors to disclose any actual, potential, or perceived conflicts of interest prior to initiating their relationship with us, or as soon as a Vendor becomes aware of a conflict after initiating a relationship; and we expect fair, non-collusive competition among our potential Vendors, contractors and subcontractors.
- Anti-Bribery and Anti-Corruption: We take a zero-tolerance approach to bribery and corruption. Vendors must act professionally, fairly and with integrity in all business dealings on behalf of Cass. Vendors are expected to develop policies, procedures, and internal controls to comply with applicable anti-bribery and anti-corruption laws and to ensure that subcontractors, agents, and anyone acting on behalf of a Vendor, also comply with such laws. Vendors and those acting on their behalf shall not promise, give, or accept any bribe, improper fee, kickback, gift, entertainment, or other thing of value to or from another person or entity, including but not limited to foreign government officials and employees of state-controlled enterprises, in order to obtain or retain business. Vendors are not allowed to make any charitable contributions or political donations in order to obtain or retain business. Vendors and those acting on their behalf are also prohibited from providing, facilitating or expediting payments to anyone regardless of the amount.
- Gifts and Political Contributions: Our employees cannot accept a gift (or multiple gifts) from a Vendor with a cumulative value exceeding \$100 USD (or non-U.S. currency equivalent) in a calendar year. Cash or cash equivalent gifts of any value are strictly forbidden. Vendors are prohibited from improperly providing or offering gifts or anything of value to employees, government officials, or other corporate representatives in an effort to obtain or retain business. Political contributions must not be made on behalf of, or as a representative of Cass, in an effort to influence a business relationship or to request influence of a political figure in favor of the company.
- Anti-Money Laundering: Vendors must not engage in illicit activities, including doing business with those engaged in illicit activities, including, without limitation, money laundering, terrorism financing, human trafficking, slavery or the proliferation of weapons of mass destruction.

Compliance with Laws and Regulations

Vendors are required to comply with all laws and regulations applicable to their business, including but not limited to those related to wages, hours, labor, health, safety, and the environment.

Employment and Labor

- Forced Labor: Cass will not tolerate the use of forced or involuntary labor.
- Child Labor: Cass will not tolerate the use of child labor. Vendors are required to employ only workers who meet the applicable minimum legal age requirements in their country of operation. Workers below the age of 18 shall not be employed in jobs that are likely to jeopardize the health and safety of young workers.
- Employment Status: Vendors shall employ only workers who are legally authorized to work in their location. Vendors are responsible for validating employees' work eligibility status.
- Compensation and Working Hours: Vendors shall provide all workers with accurate information about their wages, mandated benefits and any other basis of their compensation. Vendors shall comply with applicable labor laws governing working hours and employee compensation in all locations in which they operate.
- Employment Practices: Vendors shall not (i) use any form of slave, forced, bonded, indentured or involuntary labor, and shall fully comply with all laws that prohibit the use thereof, as and when applicable, (ii) engage in human trafficking or exploitation, (iii) import goods tainted by slavery or human trafficking, or (iv) retain employees' government-issued identification, passports or work permits as a condition of employment.
- Discrimination: Vendors are required to provide an inclusive and non-discriminatory working environment in which all their employees are treated fairly.

Health and Safety & Environment

- Vendors shall: (i) provide their employees with a safe workplace, (ii) have reasonable procedures to detect, prevent and handle potential risks to the health, safety and security of employees, and (iii) follow all applicable laws relating to health and safety in the workplace.

- Vendors are expected to conduct their operations in a way that protects the environment. Vendors shall comply with all applicable environmental laws and regulations in the countries in which they operate.

Reporting Concerns

If a Vendor becomes aware of or suspects misconduct relating to services related to Cass, or a violation of this Code of Conduct, then the Vendor will report it to their appropriate contact at Cass. If a Vendor suspects that a Cass associate has been acting in less than full compliance with law and ethical business practices, the Vendor should contact (anonymously, if so desired) the Ethics Hotline by phone at: (844) 393-0685; or by mailing a note with relevant documentation (if available) to Cass Information Systems, Inc., Attn: Internal Audit, 12444 Powerscourt Drive, Suite 550, St. Louis, MO 63131.