Gifts and Entertainment Policy

Purpose
Deluxe Corporation and its subsidiaries (Deluxe) recognizes that gift giving and receiving is a standard business custom. This Gifts and Entertainment Policy (Policy) provides guidelines to assist employees in making appropriate gift giving and receiving decisions.

Background
Offers of gifts and entertainment between Deluxe and its customers, suppliers, and other business partners may be an acceptable part of doing business and a way to build goodwill. Providing or accepting occasional meals, small logoed mementos, and tickets to sporting and cultural events may be appropriate in certain circumstances. However, if offers of gifts or entertainment are frequent or of substantial value, they may create an actual or perceived conflict of interest.

Deluxe has developed this Policy to help employees make the right decisions when providing or accepting gifts or entertainment while employed by Deluxe. The Deluxe Corporation Code of Business Ethics and Anti-Corruption and Bribery Policy also help guide employees when providing or accepting gifts or entertainment while conducting Deluxe business.

Employees must exercise good judgment in accepting or providing gifts or entertainment and should talk to their manager or the Corporate Law Department when in doubt about whether to accept or provide a gift.

Scope
This Policy applies whenever business courtesies such as gifts, meals, or entertainment are offered to or offered by a Deluxe employee or an agent (such as a customer, supplier, or business partner).

Appropriate gifts
Deluxe recognizes that it is customary for its employees, customers, suppliers and other business partners to occasionally exchange small gifts, often promotional in nature. It is important, however, that these gifts do not impact how we do business or give the appearance that the gift may impact how we do business. Accordingly, Deluxe and its employees must be careful when it comes to accepting or providing gifts. As a general rule, Deluxe employees may accept gifts from or provide gifts to customers, suppliers, or other business partners, provided the gift:

- is for legitimate business purposes, such as building goodwill and strengthening working relationships (e.g., holiday or ceremonial presentations, service anniversaries, retirement);
- does not create the appearance that the gift giver or a related person is entitled to special treatment, an award of business, better prices, or improved terms of sale;
- does not occur during contract negotiations or while a proposal for business is pending;
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- would not embarrass Deluxe or the gift giver if disclosed publicly; and
- is valued no greater than $50 or has a total cumulative value of $100 during the course of a year.

Employees who receive a gift at an event of a ceremonial nature that might not be appropriate under this Policy, but is impractical or offensive to refuse, may accept the gift and then promptly report it to their manager. The employee and manager can then discuss how to handle the gift with the Assistant General Counsel of Compliance/Corporate Law Department.

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<thead>
<tr>
<th>Prohibited gifts</th>
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<td>Deluxe employees may never provide gifts to or receive gifts from customers, suppliers, or other business partners if the gift is one of the following:</td>
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<td>- cash or a cash equivalent (e.g., gifts cards, gift certificates, money orders);</td>
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<td>- prohibited by local law;</td>
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<td>- given as a bribe, payoff, or kickback (e.g., to obtain or retain business);</td>
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<td>- prohibited by the gift giver’s organization;</td>
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<td>- given in the form of services or other non-cash benefits (e.g., the promise of employment);</td>
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<td>- given to family members of customers, suppliers, or other business partners.</td>
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<th>Appropriate entertainment</th>
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<td>Entertainment includes events, such as a sporting event or meal, where the host is present. Any sporting or other cultural event for which tickets are provided by Deluxe or accepted by a Deluxe customer, supplier, or other business partner, not attended by the host, are “gifts” and fall under the gift parameters defined above.</td>
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Business entertainment can play an important role in strengthening working relationships among business partners. Accordingly, Deluxe employees may accept or provide business entertainment offered for legitimate business purposes, such as building goodwill and enhancing relationships with customers or suppliers, provided that the entertainment complies with this Policy. Specifically, accepting or providing entertainment is permitted only if such entertainment:

- is infrequent;
- is reasonably related to a legitimate business purpose (e.g., accompanying a customer or supplier to a local theater/sporting event or attending a business meal);
- is not given as a bribe, payoff, or kickback (e.g., to obtain or retain business);
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- does not create the appearance that the gift giver is entitled to special treatment, an award of business, better prices, or improved terms of sale;
- is in good taste and occurs at a business appropriate venue;
- is reasonable and appropriate in the context of the business occasion; and
- would not influence, or appear to influence the employee’s ability to act in the best interest of Deluxe.

Employees should talk to their manager or the Assistant General Counsel of Compliance/Corporate Law Department when in doubt as to whether an event, location, or expenditure is appropriate.

Prohibited entertainment

Deluxe employees may never provide entertainment to or receive entertainment from customers, suppliers, or other business partners if the entertainment is in the form of the following:

- entertainment that can be viewed as excessive, extravagant, or lavish in the context of the business occasion;
- “adult” entertainment or any sort of event involving nudity or lewd behavior;
- entertainment that the recipient knows the gift giver is not permitted to give; and
- entertainment that is otherwise prohibited by law.

Incentives and promotions

Raffle gifts, door prizes, incentives, product awareness promotions, and other similar business oriented small incentives may be offered to employees in connection with a Deluxe sponsored or endorsed event. Any incentives must be designed to comply with applicable compensation, benefits, and tax law.

Incentives that are offered on an industry-wide basis should be in line with the gifts and entertainment guidelines, and if inappropriate, should be declined.

Policy compliance and exceptions

All managers are responsible for enforcement of and compliance with this Policy, including its communication to their employees. If there is an event or gift which exceeds the Policy limits and is necessary, an exception can be sought through the General Counsel. Anyone who does not comply with this Policy shall be subject to disciplinary action, up to and including termination, to the extent permissible under local law.

If you have information about a possible violation of this Policy, contact the Corporate Law Department, ethics@deluxe.com, or the Deluxe Hotline.
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**Anti-retaliation policy**  
Deluxe prohibits any form of retaliation for reporting a suspected violation of this Policy in good faith.

**Review schedule**  
This Policy is reviewed every two years, or as required by circumstances or operation of law.

**Revision history**

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<tr>
<th>Date</th>
<th>Reviewed By</th>
<th>Change Description</th>
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<tbody>
<tr>
<td>August 2017</td>
<td>Lisa Beth Lentini</td>
<td>New format</td>
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