

ACI WORLDWIDE CODE OF ETHICS FOR CEO & SENIOR FINANCIAL OFFICIERS POLICY

Policy Number 7-410

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POLICY

The Chief Executive Officer, the Chief Financial Officer, the Chief Accounting Officer, the Controller and persons performing similar functions (each individually, a "Senior Officer" and collectively, the "Senior Officers") of ACI Worldwide, Inc. ("ACI") have special roles to adhere to ethical conduct and integrity generally, and to promote accurate, fair and timely reporting of ACI's financial results and condition and other information ACI releases to the public market and includes in reports filed with the Securities and Exchange Commission ("SEC"). Because of these special roles, the Senior Officers are bound by the following Code of Ethics (this "Code") in the performance of their duties on behalf of ACI:

- Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships, including disclosure to the Chairperson of the Audit Committee of any material transaction or relationship that reasonably could be expected to give rise to such a conflict.
- Provide information within the scope of his or her duties in a manner which promotes full, fair, accurate, timely and understandable disclosure in reports and documents that ACI files with, or submits to, government agencies and in ACI's other public communications.
- Act in good faith in order to promote ACI's compliance with applicable rules and regulations of foreign, federal, state, provincial and local governments, and other appropriate private and public regulatory agencies.
- Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing one's independent judgment to be subordinated.
- Respect the confidentiality of information acquired in the course of one's work except when authorized or otherwise legally obligated to disclose it, and not use confidential information acquired in the course of one's work for personal advantage.
- Proactively promote and be an example of ethical behavior.
- Achieve responsible use of and control over all assets and resources employed or entrusted.
- Promptly report to the person or persons identified below any conduct that the individual believes to be, or would give rise to, a violation of this Code.

Each Senior Officer will be held accountable for his or her adherence to this Code. Failure to comply with this Code, including reporting any suspected violations, may result in disciplinary action, up to and including termination of employment. Violations of this Code may also constitute violations of law and may result in civil and criminal penalties for the Senior Officer and/or the Company.

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Any suspected violation of this Code shall be reported to the General Counsel of ACI or the Audit Committee of the Board of Directors. Alternatively, suspected violations of this Code may be reported through the following third party: Alertline, a division of Global Compliance, at 1-800-454-8167*. Alertline will notify ACI of any report of a suspected violation but will not disclose the identity of the reporting person if that person requests anonymity. It is against ACI's policies to retaliate against any employee for good faith reporting of violations of this Code.

This Code supplements ACI's Code of Business Conduct and Ethics applicable to all employees, including the Senior Officer.

* If you are calling from outside the U.S. or Canada, please refer to the Alertline International Calling Instructions.