

Introduction

The Board of Directors of Metavante Technologies, Inc. ("**Board**") has adopted this Code of Business Conduct and Ethics ("**Code**") for its employees, officers, directors and consultants. This policy sets forth basic principles to guide all employees, officers and directors of Metavante Technologies, Inc. and its subsidiaries (collectively, "**Metavante**") with whom Metavante has a business relationship.

All of Metavante's employees, officers and directors (collectively, "**Metavante employees**") are subject to this Code and must conduct themselves accordingly and strive to avoid even the appearance of improper behavior. Metavante's agents and representatives, including consultants, are also expected to comply with the Code.

Any violation of laws, rules, regulations and standards in this Code will be subject to disciplinary action which, depending on the severity of the situation, may include termination.

Consulting Resources / Hotline Information

Metavante employees who become aware of misconduct or violation or potential violation of this Code should immediately report such to their supervisor, manager, the Executive Vice President of Human Resources, or the Chief Administrative Officer of Metavante. In addition, Metavante employees may anonymously report such conduct by contacting the **Whistleblowers Hotline** at **866-923-8892**.

Compliance with Laws, Rules and Regulations

General. Metavante's ethical standards are built on a foundation of obeying the law, both in letter and in spirit. All Metavante employees must respect and obey the laws, rules and regulations of the cities, states and countries in which Metavante operates. In addition, all policies and standards that are established within Metavante must be observed.

Corporate Environment. Metavante strives to conduct business in ways that preserve and promote a clean, safe and healthy environment. Metavante is committed to complying with all environmental laws and regulations.

Anti-Corruption Laws. All Metavante employees must comply with the anti-corruption laws in the countries in which Metavante operates, including the U.S. Foreign Corrupt Practices Act ("**FCPA**"). The FCPA prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. Making illegal payments to government officials of any country is prohibited. In addition, the U.S. government has numerous laws and regulations limiting business gratuities that may be received by U.S. government personnel.

Employment Standards of Conduct

All Metavante employees are expected to conduct themselves in an appropriate and professional manner at all times. Metavante employees are expected to report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. Misusing controlled substances or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs or alcohol on the job is strictly prohibited. Metavante does not tolerate aggressive, violent, intimidating or threatening behavior in the workplace.

Metavante has a long-standing policy to offer a fair and equal employment opportunity to every person regardless of age, race, color, creed, religion, disability, marital status, sex, sexual orientation, national origin, or other legally protected status, as required by law. Metavante seeks to provide a work environment that is free from intimidation and harassment based on any of these characteristics and Metavante specifically prohibits such intimidation and harassment.

