

Bottomline ESG Policy

Environmental, Social, and Governance

Effective Date: December 22, 2025



Legal Statement

Version: [Category]

© 2005 Bottomline Technologies, Inc.

All Rights Reserved

Information in this document is confidential and proprietary to Bottomline and is subject to change without notice. Bottomline makes no warranties with respect to this documentation. Bottomline and the Bottomline logo are registered trademarks of Bottomline Technologies, Inc.

Bottomline

Corporate Headquarters

Attention: Legal Department
100 International Drive, Suite 200
Portsmouth, NH 03801 USA
Telephone: (603) 436-0700, (800) 243-2528
Email: info@bottomline.com

EMEA Headquarters

Attention: Legal Department
1600 Arlington Business Park
Theale, Reading, Berkshire RG7 4SA
Telephone (local): [0870-081-8250](tel:0870-081-8250)
Telephone (International): [44-118-925-8250](tel:44-118-925-8250)
Email: emea-info@bottomline.com



Table of Contents

1	Purpose	1
2	Scope.....	1
3	Focus Areas	1
3.1	Better Environment	1
3.2	Better Society	2
3.3	Better Governance	2
3.3.1	Data Protection and Information Security	2
3.3.2	Business Ethics and Integrity	2
3.3.3	Artificial Intelligence (AI)	2
4	Reporting and Disclosures.....	3
5	Oversight and Responsibilities	3
6	Definitions.....	3



1 Purpose

As used in this ESG Policy (“ESG Policy”), the term “Bottomline” or “Company” shall mean Bottomline Technologies, Inc. as well as all of its global subsidiaries and affiliates. Bottomline believes that business-relevant sustainability factors can play an important role in the success of our business. This policy is intended to provide a broad framework for Bottomline’s approach to Environmental, Social and Governance (ESG) initiatives, ensuring implementation of the responsibility we feel to operate in an environmentally and socially responsible manner, consistent with and subject to applicable law. This policy is aligned with our ESG priorities of meeting our regulatory obligations, supporting our customers, and executing our commitments to improve our ESG position year on year.

Our purpose as a business is to transform the way businesses pay and get paid. Carrying out that purpose, we are led by guiding principles that shape how we work with each other, our customers and our partners:

- Delight Customers
- Work With and for Each Other
- Create & Grow Sustained Business Value
- Excellent Execution

2 Scope

This ESG Policy applies to how we evaluate and engage with all aspects of our Company’s operations, including our employees, customers and suppliers (as defined in Bottomline’s Supplier Code of Conduct). All Company employees are expected to contribute to the effective implementation of this ESG Policy as well as abide by Bottomline’s Code of Ethics policy and the company’s four Guiding Principles. All suppliers in Bottomline’s supply chain are also required to represent the principles in this ESG Policy and the Supplier Code of Conduct. This ESG policy sets out the principles that apply to all our global operations, with the expectation and understanding that all local practices and laws are followed.

3 Focus Areas

3.1 Better Environment

We strive to reduce our environmental impact through energy efficiency initiatives, strategic office footprint amongst a hybrid working environment, responsible resource use, and transparent reporting of GHG emissions. We are continuing to expand our transparency and



focus on tracking emissions in major operational geographies including US, UK, Switzerland, India and Kosovo. All emission details are available in our annual ESG report. While we do not currently have a climate target (Net Zero or other) or align to SBTi, we are working toward these as next steps once we have reached a suitable baseline.

3.2 Better Society

We are committed to creating a welcoming, safe and ethical workplace where employees can thrive. Our approach includes investing in well-being programs and competitive benefits, fostering engagement through regular employee surveys, team and site events, recognition awards, and promoting a supportive environment guided by our Fair Treatment, Respect, and Workplace Conduct policy. We provide training and resources to help employees reach their full potential and ensure we hire and retain individuals who uphold our standards and values through robust recruitment practices and employment background checks. Beyond the workplace, we encourage community involvement through corporate social responsibility initiatives such as paid volunteer time off and local charitable events, reinforcing our commitment to making a positive impact in the communities where we operate.

3.3 Better Governance

We align with industry-leading governance standards and oversight practices, ensuring accountability and continuous improvement.

3.3.1 Data Protection and Information Security

We seek to create a secure environment that protects our customers, employees, and company and to comply with applicable laws and regulations. We maintain strong governance practices, including compliance with GDPR, CCPA/CPRA, HIPAA and other global standards. Bottomline holds ISO 27001, PCI DSS, and SOC 2 accreditations and complies with FCA, BACS, SWIFT, and SIC requirements where applicable.

3.3.2 Business Ethics and Integrity

All employees, contractors, and third-party vendors abide by industry-standard excellence in policies such as our Code of Ethics that underscore multiple policies including, but not limited to, nondiscrimination, anti-corruption and anti-bribery, and anti-harassment. We uphold and condemn any use of forced labor or violence against workers, child labor, discrimination and harassment through our Supplier Code of Conduct and UK Anti-Slavery and Human Trafficking Statement and more.

3.3.3 Artificial Intelligence (AI)



Bottomline's AI strategy elevates the customer experience, multiplies value across the business, and provides employees with tools that make work easier and more impactful. Our employees abide by our internal Artificial Intelligence (AI) Use Policy and Standards to ensure safe and ethical adoption of AI in the workplace.

4 Reporting and Disclosures

Bottomline executes annual reporting to suffice to mandatory local requirements where we do business including, but not limited to, SECR and ESOS reports. Additional voluntary reporting includes Bottomline's annual ESG Report, CDP submission, and EcoVadis profile. Bottomline also participates in Thoma Bravo's annual Responsible Growth & Governance (RGo) Scorecard where we are in exemplary standing. The ESG Program Lead with support from Subject Matter Experts across the business are responsible for executing these reporting requirements. This list of mandatory or voluntary reporting outlets is subject to change dependent on local regulations and the ESG industry landscape, in line with Company priorities.

5 Oversight and Responsibilities

The Company's ESG Program Lead, with support and guidance from the ESG Executive Steering Committee who meet quarterly, is responsible for reviewing this ESG Policy every year and amending, supplementing or otherwise modifying this ESG Policy as it deems appropriate, including in response to changes in industry demands and regulations. The ESG Executive Sponsor and key members of the ESG Executive Steering Committee share progress with, and may seek input from, the Board annually.

6 Definitions

Carbon Footprint: Total greenhouse gas emissions caused directly and indirectly by an organization.

CDP or Carbon Disclosure Project: a non-profit that runs environmental disclosure systems for companies, cities, states and regions.

CSR or Corporate Social Responsibility: when a company integrates social and sustainable concerns into business operations and aims to create a positive corporate social impact

EcoVadis: a global provider of corporate sustainability ratings, intelligence, and tools

ESG or Environmental, Social, and Governance: a framework for assessing corporate responsibility and sustainability



ESOS or Energy Savings Opportunity Scheme - a mandatory energy assessment scheme for organizations in the UK that meet the qualification criteria

Governance: Structures and processes ensuring accountability, transparency, and ethical conduct

Greenhouse Gas Emissions (GHG) - The sum of emissions of various heat-trapping gases. Greenhouse gases include carbon dioxide, methane, nitrous oxides and fluorinated gases such as hydrofluorocarbons

Net Zero- The result of lowering greenhouse gas emissions as close as possible to zero and balancing remaining emissions with removals

SBTi or Science Based Targets initiative- a collaborative effort which works to encourage companies to set ambitious emissions reduction targets to mitigate GHG emissions in conjunction with the latest climate science

SECR or Streamlined Energy and Carbon Reporting - a mandatory scheme that applies to large UK companies.

Bottomline's Four Guiding Principles – Delight Customers, Excellent Execution, Work With & For Each Other, Create & Grow Sustained Business Value

This ESG Policy was last updated on December 22, 2025 and is subject to change as the ESG Program Lead and ESG Steering Committee considers necessary or advisable.