

**Whistleblower Policy of
Tyler Technologies, Inc.
Updated December 2018**

Procedures for the Submission of Complaints or Concerns Regarding Financial Statement
Disclosures, Accounting, Internal Accounting Controls, or Auditing Matters

Section 301 of the Sarbanes-Oxley Act of 2002, the applicable rules of the Securities and Exchange Commission, and the listing standards of the New York Stock Exchange require the Audit Committee (the "Committee") of Tyler Technologies, Inc. ("Tyler") to establish formal procedures for: (a) the receipt, retention, and treatment of complaints received by Tyler regarding accounting, internal accounting controls, or auditing matters; and (b) the confidential, anonymous submission by Tyler employees of concerns regarding questionable accounting or auditing matters.

Tyler is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls, and audit practices and does not permit retaliation of any kind against employees for complaints submitted to the Committee.

Accordingly, in order to facilitate the reporting of concerns and complaints, Tyler's Audit Committee has established the following procedures for (1) the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls, or auditing matters, including concerns regarding questionable accounting or auditing matters (collectively, "Accounting Matters"), and (2) the confidential, anonymous submission by employees of Tyler of concerns regarding Accounting Matters.

Submission of Complaints

- A. Any person, including employees, with a concern or complaint regarding Accounting Matters may submit their concern or complaint in writing to the chairperson of the Audit Committee at Tyler's corporate headquarters by regular mail as follows:

Board of Directors
Audit Committee Chairperson Tyler Technologies, Inc.
5101 Tennyson Drive
Plano, TX 75024

The person submitting a complaint may choose to remain anonymous. However, if the person requests contact, a telephone number should be included in the submission at which they may be contacted if the Audit Committee determines that contact is appropriate.



Any Tyler employee may submit a concern or complaint regarding Accounting Matters to the Committee or Tyler management without fear of dismissal or retaliation of any kind. Tyler will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of an employee with respect to good faith reporting of concerns or complaints regarding Accounting Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002.

- B. Any person, including employees, may forward concerns or complaints regarding Accounting Matters on a confidential and anonymous basis to the chairperson of the Audit Committee through an Internet hotline or voicemail as follows:

Internet

Go to <http://www.openboard.info/tyl/> to access an Internet-based message interface that will deliver a message directly to the Audit Committee. Be advised that to use this system with complete anonymity, you should send this message from an unidentifiable location and not your work-based computer.

Voicemail

Call 866-376-4128 to leave an anonymous message with the Audit Committee. Be advised that leaving a message on this voicemail system may not necessarily protect your anonymity. For other anonymous submission options, please reference the physical mailing and/or Internet submission options above.

Scope of Matters Covered by These Procedures

These procedures relate to concerns or complaints relating to any questionable accounting matters including, without limitation, the following:

- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of Tyler;
- Fraud or deliberate error in the recording and maintaining of financial records Tyler;
- Deficiencies in or noncompliance with Tyler's internal accounting controls;
- Misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of Tyler; and/or
- Deviation from full and fair reporting of Tyler's financial condition.

