

# Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains CPI Card Group®

This statement outlines CPI Card Group's position on modern slavery and human trafficking in its supply chains and provides disclosures under applicable law regarding steps CPI Card Group takes to prevent the use of forced labor in its supply chain.

## Introduction

CPI Card Group Inc. (“CPI”) is a payment technology company and leading provider of credit, debit and prepaid solutions in the United States. CPI has more than 20 years of experience in the payments market and is a trusted partner to financial institutions and payments services providers. Serving customers from locations throughout the United States, CPI has a large network of high security facilities, each of which is audited for compliance with the standards of the Payment Card Industry Security Standards Council by one or more of the following payment card brands: Visa, Mastercard®, American Express and Discover® in the United States and Interac in Canada. Learn more at [www.cpicardgroup.com](http://www.cpicardgroup.com).

## Our Structure, Business and Supply Chains

CPI's operations are located primarily in the United States, where it employs approximately 1,150 individuals. Additionally, CPI maintains a small office in the United Kingdom where we employ approximately 10 employees that provide a support function to our US business operations and which has minimal impact or exposure to CPI's overall supply chain. The company's [2022 Annual Report](#) contains further information regarding our business structure and supply chains.

As a responsible corporate citizen, CPI strives to ensure all human rights are upheld for our employees and all workers in our supply chains. We prohibit the use of child labor, slave and forced labor, and human trafficking in our supply chains and in our business. This is consistent with our obligation, set forth in our Code of Business Conduct and Ethics, to act ethically and with integrity in all our business relationships. We have thus implemented policies and systems aimed at preventing modern slavery and human trafficking in our business, including our supply chains. As part of these efforts, we:

- Aim to build long term relationships with our suppliers and clearly highlight to them our expectations of business behavior;
- Take steps designed to ensure that the companies in our supply chain have suitable anti-slavery and human trafficking policies and procedures in place;
- Encourage the reporting of concerns and provide appropriate protection for whistleblowers under our Code of Business Conduct and Ethics;
- Educate our employees regarding our position on anti-slavery and human trafficking and require employees to report identified concerns; and
- Maintain a Supplier Code of Conduct that prohibits the use of child labor, slave and forced labor, or human trafficking in our supply chains educate our suppliers as to and strive to require our suppliers to comply with our Supplier Code of Conduct.

## **Our Commitment, Codes, Employees and Suppliers**

CPI's compensation practices comply with all applicable wage laws and regulations, including those relating to minimum wages and legally mandated benefits. CPI and the entities in its supply chain are expected to offer vacation time, leave periods, and holidays consistent with applicable laws and regulations and pay employees in a timely manner, as provided in our Supplier Code of Conduct. For each pay period, CPI employees are provided with a timely and understandable wage statement that provides sufficient information to verify the pay received for the work performed by such employees.

Our Code of Business Conduct and Ethics is available and communicated to all new employees within the organization, and continues to be regularly reaffirmed with our current employees. We hold our employees accountable when we become aware, and have determined after appropriate investigation, that they have failed to adhere to our Code of Business Conduct and Ethics. We do so through a number of disciplinary and corrective actions, up to and including termination of employment.

We provide training regarding anti-slavery and human trafficking to employees within the organization designed to assist in identifying, addressing and mitigating associated risks.

We have a whistleblower hotline and case management software tool whereby employees can report a complaint or grievance, including with respect to any asserted failure to comply with CPI's policies on modern slavery or human trafficking. These reports can be made anonymously via website and/or telephone. CPI's entire workforce, including those that oversee supply chains, are trained on our Code of Business Conduct and Ethics, which includes information on how to use the whistleblower hotline. When a complaint or grievance is received, there are clear processes and procedures for documenting, investigating and addressing the complaint or grievance. Where necessary, corrective actions are implemented to prevent the reoccurrence of similar complaints.

We will not support or deal with any business that we know to be involved in slavery or human trafficking. We have a Supplier Code of Conduct that includes prohibitions on slavery and human trafficking. We expect our suppliers to comply with the Supplier Code of Conduct. We strive to include covenants in agreements with our suppliers obligating them to comply with our Supplier Code of Conduct and thereby commit to comply with the laws, rules and regulations in the countries in which they operate, including laws regarding human trafficking and slavery. We do not, however, require our direct suppliers to certify that the materials they supply comply with these laws. Additionally, we require our direct suppliers to mandate that next tier suppliers supplying goods or services that are used in the goods or services provided to CPI (including affiliates, contractors and subcontractors) acknowledge and adhere to the Supplier Code of Conduct. We also encourage our suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics.

We engage third parties to review certain of our suppliers independently and without notice to the supplier to evaluate their practices and reputation, including for slavery and human trafficking.

We do not, however, audit all of the suppliers in our supply chains. We have not engaged a third party to comprehensively evaluate our supply chains for risks, including those relating to human trafficking and slavery.

As a responsible corporate citizen, we expect our suppliers to respect human rights and adhere to the UK Modern Slavery Act and all similar laws, as applicable. Key suppliers may be asked to provide a statement of conformity to the UK Modern Slavery Act and similar laws.

CPI is committed to maintaining and improving systems and processes to prevent and combat modern

slavery and human trafficking within our own operations and supply chain. We update our policies and standards based on industry initiatives and customer requirements. This statement, and our other governance policies, are reviewed and approved by CPI's Board of Directors annually. This statement is made pursuant to section 54(1) of the UK Modern Slavery Act and constitutes our slavery and human trafficking statement. The statement covers CPI Card Group Inc. and its subsidiaries.

This statement was approved on May 30, 2019 by our Board of Directors and signed by Scott Scheirman, President and Chief Executive Officer of CPI Card Group, on May 30, 2019. This statement has been ratified and approved by our Board of Directors on May 26, 2020, September 22, 2021, September 20, 2022, and October 3, 2023.



Scott T. Scheirman, Director for and on behalf of

CPI CARD GROUP INC.

Date: October 3, 2023