**Supplier Code of Conduct CPI Card Group®**

Dated November 2025

## Introduction

CPI Card Group Inc. takes its obligation to be a responsible global citizen seriously. We align our expectations with international and industry standards for ethical and sustainable businesses. We adhere to the principles we define for ourselves in our own Code of Business Conduct and Ethics and we expect that all vendors, suppliers and other affiliated third parties will abide by the expectations outlined in this Supplier Code of Conduct ("Supplier Code").

Sustainability is the linkage of social, environmental and economic responsibility. We expect our vendors, suppliers and other affiliated third parties providing services, products, materials, tools and equipment, regardless of location (hereinafter referred to as "Supplier(s)"), to demonstrate their commitment to sustainability consistent with the Supplier Code. Any violation of this Supplier Code by a Supplier is considered a material breach and can result in immediate termination of any associated contract.

Our Supplier Code is intended as an end-to-end supply chain initiative. Accordingly, our Suppliers are expected to communicate to their CPI-related suppliers that they are expected to understand and comply with the requirements of the Supplier Code. Fundamental to adopting our Supplier Code is the understanding that a business, in all of its activities, must operate in full compliance with the laws, rules and regulations of the countries in which it operates and conducts business activities within. We also encourage Suppliers to go beyond legal compliance, drawing upon internationally recognized standards, in order to advance social and environmental responsibility and business ethics. If there are differing standards between the Supplier Code and local law, the strictest requirements shall govern.

The Supplier Code is made up of five sections:

Section A outlines standards for Labor.
Section B addresses requirements relating to Health and Safety.
Section C focuses on the Environment.
Section D adds standards relating to Business Ethics.
Section E outlines Supplier Compliance Obligations.

## A. Labor

We respect and observe internationally proclaimed human rights, including the rights of personal dignity and privacy. Our approach is guided by three internationally recognized frameworks: the United Nations Guiding Principles on Business and Human Rights (UNGP), the Universal Declaration of Human Rights (UDHR), and the International Labour Organization's Declaration on Fundamental

Principles and Rights at Work (ILO Declaration). We work to ensure that we are not complicit in human rights abuses, whether directly or by way of beneficial or silent complicity. This applies to all workers including temporary, migrant, student, contract, and direct employees, and any other type of worker. We also are committed to workplace conditions of freedom, equity, security, and dignity. The labor standards are:

1. Freely Chosen Employment: Forced labor, labor by trafficked persons, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, or slavery shall not be tolerated at any stage of manufacturing or the supply chain. As part of the hiring process, workers must be provided with a written document in their local language that contains a description of terms and conditions of employment. All work must be voluntary and workers shall be free to leave work at any time or to freely terminate their employment. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker as promptly as possible.

2. Young Workers: Child labor is absolutely and unequivocally prohibited and not to be used in any stage of manufacturing or the supply chain. The term "child" refers to any person under the age of 15, under the local age for completing compulsory education, or under the minimum age for employment according to local or national laws and regulations. In no case shall any person under the age of 14 be employed.

3. Working Hours: Working hours per day and per workweek are not to exceed any maximum set by local law. In general, a workweek should not be more than 60 hours per week, including overtime, and workers shall be allowed at least one day off every seven days when they are relieved of all work, except in emergency or unusual situations.

4. Wages and Benefits: Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted.

5. Humane Treatment: There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment.

6. Non-Discrimination and Non-Retaliation: Participants should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual

orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, covered veteran status, protected genetic information or marital status, or any other status or characteristic protected by local or national law. The prohibition on discrimination applies to hiring and terminating employees, administering discipline, and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for the free exercise of religious practices in accordance with local law.

## B. Health and Safety

We expect all suppliers to provide a safe, healthy, and respectful working environment. Suppliers must comply with all applicable health and safety laws and are encouraged to align their practices with recognized international standards such as ISO 45001 and the ILO Guidelines on Occupational Safety and Health.

1. Safe Working Environment. Suppliers must identify and manage workplace hazards and take reasonable measures to prevent injuries and accidents. This includes providing appropriate safety training, equipment, and procedures and fostering a work environment where safety concerns can be reported without retaliation.

2. Incident Prevention and Reporting. Suppliers are expected to maintain systems to identify, record, and address workplace incidents and near misses. These systems should support timely corrective action and promote continuous improvement in health and safety performance.

3. Hazard and Exposure Control. Suppliers must take appropriate steps to protect workers from exposure to chemical, biological, and physical risks. Workers must be informed of potential hazards in a manner they understand and provided with suitable protection when risks cannot be eliminated.

4. Worker Welfare and Facilities. Suppliers must provide workers with access to clean drinking water, hygienic restroom and eating facilities, and safe and orderly work environment. Where housing is provided, it must meet basic standards of safety, cleanliness, and human dignity.

## C. Environment

We recognize that environmental responsibility is integral to producing world class products. In business and manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding health and safety. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) may be useful sources of additional information on effective environmental impact management. The environmental standards are:

1. Environmental Permits and Reporting: All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained, and kept current, and their operational and reporting requirements are to be followed. It is recommended that suppliers go beyond legal requirements and publicly disclose other environmental, social and governance data using recognized frameworks, such as through Sustainability Reports. Environmental data must be disclosed to CPI upon request.

2. Pollution Prevention and Resource Reduction: Suppliers should be committed to minimizing and eliminating discharges and waste generation, such as by installing pollution control equipment; modifying production, maintenance and facility processes; or by other means. Hazardous materials should be strongly controlled, and employees should be trained in safe handling and storage practices. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved, when feasible, through practices such as modifying production, maintenance and facility processes; materials substitution; re-use; conservation; recycling or other means.

3. Climate Goals: We are committed to reducing our climate impact through reductions in greenhouse gas emissions and other measures. Suppliers should maintain similar commitments and practices, including setting their own science-based emissions reduction targets, measuring emissions outputs, and reporting progress through recognized disclosures such as CDP. Suppliers should regularly assess and adjust their operations to realize opportunities, minimize adverse impacts, and control risks relating to climate change, nature loss, and water stress.

## D. Business Ethics

To meet social responsibilities and to achieve success in the marketplace, the highest standards of ethics are expected including:

1. Business Integrity: The highest standards of integrity are to be upheld in all business interactions. Participants shall prohibit and not tolerate any and all forms of bribery, corruption, or extortion. Gifts or any other activity resulting in a conflict of interest shall not be permitted.

2. Books and Records: All business dealings should be transparently performed and accurately reflected in business books and records. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable. CPI shall have the right to request information regarding or review of a Supplier's books and records and such request shall be honored.

3. Intellectual Property: Intellectual property rights are to be respected; transfer of technology and know-how is to be done in a manner that protects intellectual property rights; and customer and supplier information is to be safeguarded.

4. Fair Business, Advertising and Competition: Standards of fair business, advertising and competition are to be upheld.

5. Protection of Identity and Non-Retaliation: Programs that ensure the confidentiality, anonymity and protection of Supplier and employee whistleblowers are to be maintained. Whistleblowers must be able to raise any concerns without fear of retaliation.

6. Responsible Sourcing of Minerals: We expect Suppliers to commit to assuring that the tantalum, tin, tungsten and gold in the products manufactured do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. We encourage Suppliers to conduct due diligence, consistent with the Organization for Economic Cooperation and Development ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and make diligence information available upon request.

7. Privacy: There shall be safeguards in place to protect the reasonable privacy expectations and personal information of everyone they do business with, including suppliers, customers, consumers and employees.

## E. Supplier Compliance Obligations

Our Suppliers shall comply with all applicable laws, regulations and standards and certify annually to CPI that they have a compliance program in place to identify and mitigate identified compliance risks and facilitate continuous improvement.