

# Statement on Efforts to Combat Human Trafficking and Slavery in Our Business and Supply Chains

## CPI Card Group®

Published on May 31, 2019 in respect of the financial year ending December 31, 2018.

**This statement outlines CPI Card Group's position on modern slavery and human trafficking in its supply chains.**

### Introduction

CPI Card Group is a payment technology company and leading provider of credit, debit and prepaid solutions delivered physically, digitally and on-demand. CPI helps our customers foster connections and build their brands through innovative and reliable solutions, including financial payment cards, personalization and fulfillment, and Software-as-a-Service (SaaS) instant issuance. 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 certified by one or more of the payment brands: Visa, Mastercard®, American Express and Discover®. Learn more at [www.cpicardgroup.com](http://www.cpicardgroup.com).

### Our Structure, Business and Supply Chains

CPI Card Group Inc. operates through several subsidiaries primarily in the United States, with very limited operations in the United Kingdom, and employs approximately 1,000 people. Our [2018 Annual Report](#) contains further information regarding our business structure and supply chains.

As a responsible corporate citizen, CPI Card Group strives to ensure all human rights are upheld for our employees and all workers in our supply chains. We are committed to ensuring there is no child labor, slave and forced labor, or human trafficking in our supply chains or in any part of our business. This reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls which address the risks of modern slavery and human trafficking.

As part of our efforts to identify and mitigate the risks of modern slavery and human trafficking, we shall:

- Aim to build long term relationships with our suppliers and clearly highlight to them our expectations of business behavior;
- Look to contract with in-country companies or branches whenever possible and ensure that these entities 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](#); and

- Educate our employees regarding our position on anti-slavery and human trafficking and to identify and report concerns.
- Educate our suppliers as to our [Supplier Code of Conduct](#).

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

CPI Card Group's compensation practices comply with all applicable wage laws, including those relating to minimum wages, and legally mandated benefits. CPI Card Group and entities and suppliers employing labor working at or in conjunction with CPI Card Group supply chain must offer vacation time, leave periods, and holidays consistent with applicable laws and regulations and pay employees in a timely manner. For each pay period employees are provided with a timely and understandable wage statement that provides sufficient information to verify.

Our [Code of Business Conduct and Ethics](#) reflects the principles of this statement; it 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 action measures up to and including termination of employment.

We provide training regarding anti-slavery and human trafficking to employees within the organization as appropriate to be able to identify, address and mitigate associated risks.

We have a whistleblower hotline and case management software tool, providing the ability to report a complaint or grievance, including with respect to modern slavery or human trafficking, anonymously via website and phone, and have invested in providing training to our whole workforce including purchasing and management functions on the whistleblowing tool. When a complaint or grievance is received, there are clear process and procedures for documenting, investigating and addressing the complaint or grievance. Where necessary, corrective actions to prevent the reoccurrence of similar complaints are implemented.

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](#), together with supporting processes and documentation, which includes prohibitions on slavery and human trafficking. We expect our suppliers to comply with the Supplier Code of Conduct. Additionally, we require direct suppliers to mandate that next tier suppliers that supply goods or services to the supplier which are used in the goods or services provided to CPI Card Group (including affiliates, contractors and subcontractors) acknowledge and implement 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.

As a responsible corporate citizen, we expect our suppliers to respect human rights and adhere to the UK Modern Slavery Act 2015 and all similar laws. Key suppliers may be asked to provide a statement of conformity to the UK Modern Slavery Act 2015 and similar laws.

CPI Card Group is committed to maintaining and improving systems and processes to

combat slavery and human trafficking within our own operations and supply chain. We regularly update our policies and standards based on industry initiatives and customer requirements. This statement, and other governance policies, are reviewed and approved by our Board of Directors annually.

This statement is made pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement. The statement covers CPI Card Group Inc. and its subsidiaries.

This statement has been 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.