



Supplier Code of Ethics and Business Conduct

CONTENTS

INTRODUCTION	3
ANTI-CORRUPTION AND ANTI-BRIBERY	3
LOBBYING AND POLITICAL CONTRIBUTIONS	3
INTERNATIONAL TRADE LAWS AND REGULATIONS	3
PROTECTED INFORMATION	4
INSIDER INFORMATION	4
FINANCIAL INTEGRITY AND ACCURATE RECORD KEEPING	4
HUMAN RIGHTS, LABOR LAWS, AND FAIR LABOR PRACTICES	5
FAIR COMPETITION AND ANTITRUST	5
CONFLICTS OF INTEREST	5
GIFTS AND ENTERTAINMENT	5
REPRESENTING CSG TO THE PUBLIC	6
ENVIRONMENTAL RESPONSIBILITY	6
COOPERATION WITH REGULATORS	6
PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY	6
REPORTING VIOLATIONS OF THE CODE	7
CONTACTING CSG	7

INTRODUCTION

“CSG” means CSG Systems International, Inc. and its subsidiaries and affiliates. CSG is committed to uncompromised integrity and ethical behavior in everything it does. These principles are the foundation of our success and must be sustained through every business relationship.

CSG expects all its agents, consultants, contractors, distributors, suppliers, and other representatives, as well as their respective employees, agents, subcontractors, temporary staff and other representatives (collectively, “CSG Suppliers” or “You”), to operate under the same high standards, integrity and professionalism.

Every CSG Supplier must agree to comply with CSG’s Supplier Code of Ethics and Business Conduct (“Code”). Although CSG recognizes the different legal and cultural environments in which CSG Suppliers operate, CSG Suppliers must comply with the fundamental legal and ethical principles described in this Code.

The intent of this Code is to increase ethical business practices and social environmental awareness. The Code is not intended to replace, supersede, or conflict with any applicable law, regulation or contractual obligation with CSG. Contracts with CSG may contain more specific or restrictive provisions addressing these same issues, in which case the applicable contractual provision will control, except to the extent it is contrary to law.

CSG reserves the right to revise this Code at any time. CSG Suppliers are responsible for checking for updates to the Code.

You can find the code [here](#) on our website.

ANTI-CORRUPTION AND ANTI-BRIBERY

CSG does not tolerate any form of corruption (bribery, kickbacks, fraud, etc.). CSG and its CSG Suppliers must comply with all applicable international anti-corruption and anti-bribery laws, including without limitation the United States Foreign Corrupt Practices Act (FCPA) and the U.K.

Bribery Act, and must have adequate policies and procedures in place to monitor compliance with such laws.

CSG Suppliers are strictly prohibited from engaging in illegal payments or corrupt activities of any kind, including the offering or payment of bribes, kickbacks, or facilitation payments on CSG’s behalf. CSG Suppliers must understand when they are dealing with a government official and when any offer or payment would be legitimate or constitute a bribe.

If you are ever in doubt as to whether an offer or a payment on behalf of CSG constitutes a corrupt practice, contact the CSG Compliance Department at ethicsandcompliance@csgi.com.

CSG Suppliers must immediately report any suspected or actual corrupt activities to CSG. You may contact CSG’s Chief Compliance Officer or use the CSG Compliance Reportline. Contact details are provided at the end of this Code.

LOBBYING AND POLITICAL CONTRIBUTIONS

CSG Suppliers shall not contact legislators, federal or state regulatory officials or their staffs or make political contributions on behalf of CSG.

INTERNATIONAL TRADE LAWS AND REGULATIONS

In addition to anti-corruption and anti-bribery laws, CSG Suppliers must adhere to all other laws and regulations applicable to international business transactions, including the following:

- Anti-boycott laws;
- Anti-money laundering laws;
- Controls on exports and re-exports of products, services and technology;
- Customs and import regulations; and
- Economic trade sanctions and embargoes.

Unless authorized by the United States government, CSG products, software, technology, and services must not be provided to any:

- Citizen, national, resident, entity, organization, or government of any country or territory that is subject to comprehensive United States or other national or multinational economic or financial sanctions or trade embargoes;
- Individual or entity that is the subject or target of any United States or other national or multinational economic, financial, or trade sanctions, including individuals and entities on the Office of Foreign Assets Control (OFAC) List of Specially Designated Nationals and Blocked Persons, or otherwise identified on a list of prohibited, sanctioned, debarred, or denied parties, or otherwise subject to such sanctions or restrictions; and
- Individual or entity if you know or suspect they will use the products, software, services or technologies for purposes or end uses prohibited by United States law, including terrorist activities or the development, design, manufacture, or production of rockets/missiles or nuclear, chemical or biological weapons.

PROTECTED INFORMATION

As a result of their engagement with CSG, CSG Suppliers may come in contact with certain information about CSG, its employees and customers (including customers of CSG's customers), which is protected information (proprietary and confidential information) and may not be disclosed. CSG Suppliers must comply with the confidentiality and non-disclosure terms in their agreements with CSG as well as all applicable privacy laws and data protection laws, to the extent they apply to protected information and the services and/or products such CSG Suppliers provide CSG.

Moreover, CSG Suppliers should not seek to access protected information unless they have authorization to do so.

CSG Suppliers must only use protected information for the purposes provided in their

agreement with CSG and may share protected information within their company only on a need to know basis.

CSG Suppliers may not provide to CSG or use on CSG's behalf proprietary information acquired from another company which that company would consider proprietary and confidential information.

INSIDER INFORMATION

CSG Suppliers must comply with all applicable securities laws and regulations regarding insider trading.

CSG Suppliers must not buy or sell CSG securities or a CSG's customer's securities while in the possession of material, non-public information about CSG or the customer, respectively. This prohibition applies to information of other companies CSG Suppliers may gain access to while engaged in CSG work.

CSG Suppliers are also prohibited from engaging in "tipping", which involves disclosing material, non-public information about CSG or one of CSG's customers to a third party who then acts on that information by trading the securities of the entity whose material information they possess.

FINANCIAL INTEGRITY AND ACCURATE RECORD KEEPING

CSG Suppliers must maintain the integrity of their books and records and comply with all applicable, legal, accounting and regulatory requirements as well as sound accounting principles. All business records, expense accounts, invoices, bills, payroll, member records, and other reports must be prepared accurately and honestly.

HUMAN RIGHTS, LABOR LAWS, AND FAIR LABOR PRACTICES

CSG Suppliers must comply with all civil rights, human rights, immigration and labor laws. CSG Suppliers are required to uphold the basic human rights of individuals and workers within their companies and their supply chain. This means You must comply with:

- Health and safety regulations;
- Laws upholding the rights of persons with disabilities;
- Domestic and international labor laws;
- Wage and work hour laws;
- Fair labor practices; and
- Human trafficking laws and/or Modern Slavery laws.

You must never use forced, debt-bonded, indentured, or child labor. The term “child” refers to any person employed under the minimum age for employment under the applicable law.

You must also never discriminate on the basis of race, color, religion, creed, gender, sexual orientation, marital status, gender identity or expression, pregnancy, national origin and ancestry, genetics, citizenship status when otherwise legally able to work, age, disability (including HIV), veteran status, or any other characteristic protected by applicable law.

FAIR COMPETITION AND ANTITRUST

CSG Suppliers must comply with all applicable laws regarding fair competition and antitrust. CSG Suppliers must not misrepresent CSG products and services or its competitors’ products and/or services. CSG Suppliers may not enter into agreements to restrain trade (for example, fix prices, rig bids, or divide markets or territories).

CONFLICTS OF INTEREST

CSG makes decisions based on unbiased, sound judgement rather than for personal gain. A “conflict of interest” occurs when a personal interest interferes with someone’s ability to make sound, objective business decisions. Since CSG wishes to maintain a partnership free of conflicts, CSG Suppliers must report to CSG all potential conflicts of interest between it and CSG, such as when one of their employees has a relationship with a CSG employee who can make decisions that will affect the CSG Supplier’s business or when a CSG employee has any kind of interest in the CSG Supplier’s business. Conflicts of interest must be reported to the CSG Legal Department prior to executing an agreement or thereafter to ethicsandcompliance@csg.com.

GIFTS AND ENTERTAINMENT

Gifts and entertainment to CSG employees are permissible if they are reasonable in value, do not exceed accepted business practices, are infrequent and never offered to a CSG employee who is involved in making or influencing a decision related to the CSG Supplier or otherwise made to influence a CSG decision. Cash or cash equivalent gifts to a CSG employee are strictly prohibited.

In addition to the Anti-Corruption Laws, there may be other applicable local laws or regulations related to gifts to and entertainment of government officials and/or commercial entities.

For example, in the United States and some other countries, gifts to and entertainment of federal, state, or local government officials may be strictly prohibited. CSG Suppliers are required to comply with all applicable laws governing interactions with government officials.

REPRESENTING CSG TO THE PUBLIC

CSG Suppliers must ensure that their personnel do not represent themselves as employees of CSG. Such personnel must never speak to the public or release documents on behalf of CSG. They may freely represent their own views, if such statements do not negatively impact the good name and reputation of CSG.

CSG Suppliers may not use CSG's name or official logo in press releases or other outside communications except as provided (if applicable) in their agreements with CSG or with the prior written approval of CSG. CSG Suppliers may not provide project or engagement specific details of their support of CSG to the public without prior written approval from CSG.

ENVIRONMENTAL RESPONSIBILITY

CSG is committed to environmental responsibility. We seek to make a positive environmental impact through our actions, and we expect our CSG Suppliers to share these responsibilities.

- **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.
- **Pollution Prevention and Resource Reduction.** Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- **Hazardous Substances.** Chemicals and other materials posing a hazard if released to the environment are to be identified and

managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

- **Wastewater and Solid Waste.** Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be characterized, monitored, controlled and treated as required prior to discharge or disposal.
- **Air Emissions.** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled, and treated as required prior to discharge.

COOPERATION WITH REGULATORS

CSG Suppliers will cooperate with regulatory authorities, including but not limited to inquiries, audits, reviews or investigations related to the business the CSG Supplier is conducting with CSG. You must, to the extent allowed to do so by law, inform CSG promptly if You are contacted by a regulatory authority regarding the business You conduct with CSG.

PROTECTION OF ASSETS AND INTELLECTUAL PROPERTY

CSG Suppliers must protect and responsibly use the physical assets of CSG, including tangible property, consumables, and equipment, when authorized by CSG to use such assets.

CSG Suppliers must comply with all applicable laws governing intellectual property rights, including protection against disclosure, patents, copyrights, and trademarks.

REPORTING VIOLATIONS OF THE CODE

CSG may at any time review or audit a CSG Suppliers' compliance with this Code.

CSG Suppliers are required to immediately report their own violations of this Code. CSG Suppliers are also asked to report to CSG any knowledge of misconduct on the part of CSG employees. Anonymous reports may be made through the CSG Reportline.

CSG Suppliers are required to cooperate fully with CSG with respect to any violation of this Code or suspected misconduct on the part of a CSG employee.

If there are reasonable grounds to believe that a CSG Supplier has violated this Code or if a CSG Supplier fails to sufficiently meet its obligations to resolve a matter or to cooperate with CSG, CSG may immediately end all business relations with the CSG Supplier. In the event of a violation of this Code, CSG retains the right to initiate further legal measures.

CONTACTING CSG

Chief Compliance Officer:

- David W. Johnson, Jr.
- Telephone: +1 402-431-7974
- Email: David.Johnson@csgi.com

Compliance Department:

Email: ethicsandcompliance@csgi.com

Reportline:

Information on how to make a report (including with anonymity) by phone or through the Reportline web portal can be found at: [CSG Reportline - CSG \(csgi.com\)](#)



8310 S. Valley Highway
Suite 300
Englewood, CO 80112