CODE OF ETHICS AND BUSINESS CONDUCT
MESSAGE FROM BRET GRIESS

Dear CSG Colleagues,

At CSG, we believe personal and professional integrity is the foundation of our success. By conducting business with integrity, we earn the trust of our customers, stakeholders, suppliers, and partners. For CSG, doing what is right — to build and retain trust — is the only way to do business.

This means that while we value results, we are careful to achieve those results through ethical, moral, and legal business practices. An unwavering commitment to integrity is at the core of CSG corporate values.

We make this commitment to our clients, suppliers, shareholders, and fellow employees; CSG will not tolerate illegal or unethical behavior. Our standards of ethical behavior go beyond legal minimums, never compromising our actions.

Our Code of Ethics and Business Conduct provides summaries of important policies governing how we work with our clients, each other, and our business partners and communities. The guidance within this manual enables us to preserve high ethical standards, live our values, and comply with regulations that govern our industry. You play a critical role in protecting a valuable asset — the trust that our customers, suppliers, shareholders, and communities place in us.

Thank you for taking the time to read and understand this Code of Ethics and Business Conduct and adhering to the principles it sets forth. In doing so, we can perpetuate the high ethical standards that have helped fuel our past success and that will contribute to our future success.

Together, we can protect our most important attribute — our reputation for integrity.

Sincerely,

Bret Griess
President and Chief Executive Officer
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INTRODUCTION

PURPOSE
Our Code of Ethics and Business Conduct (the Code) facilitates our ability to do Business with agility and integrity and reflects our commitment to act in the best interests of CSG, to treat each other with respect, and to promote the highest standards of professionalism. Your decision to be part of the CSG team reflects your commitment to uphold these principles. This commitment shapes our collective reputation in the marketplace, molds our corporate culture, and ensures the continued integrity of our business dealings.

The Code outlines the behaviors necessary to uphold the ethical standards of CSG. It will help you recognize potential ethical or legal issues and provides contact information for questions or concerns.

EVERYONE’S RESPONSIBILITIES
As representatives of CSG, we are all responsible for how CSG does business, both individually and collectively. Our reputation and success depend on the decisions and actions of our people all over the world. It is important to note that our ethical standards do not vary among localities and nationalities; everyone is required to understand, abide by, and enforce the same principles. We are committed to ensuring every action is ethical, responsible, and in full compliance with applicable laws and this Code.

We believe in selecting business partners (such as suppliers, contractors, joint venture partners, agents, sales representatives, resellers, and consultants) who share our values and approach to doing business. We expect these business partners to review, understand, and act consistently with the standards set forth in our Code.

Each of us has a responsibility to uphold the Code; in fact, compliance with the Code is a term and condition of employment with CSG. This means you must know the Code, you must do the right thing when it comes to your own conduct, and you must speak up about conduct by others that might violate our Code, our policies or the law. It also means you must cooperate as directed by CSG with any investigation, inquiry, examination, or litigation related to CSG’s business.

At CSG, new hires must take Code training shortly after they begin work and provide an affirmation that they have read and understand the Code, will comply with it, and will report suspected violations as required by the Code. All CSG personnel are required to complete additional Code training and provide a new affirmation periodically, usually annually. Personnel includes all employees and any contractors who are required by CSG to comply with the Code. Compliance with these requirements is a condition of employment.

In addition to understanding and following the principles outlined in this Code, CSG personnel and Board of Directors must:

▪ Act in accordance with various laws and regulations that govern our business
▪ Avoid instructing others to act contrary to the Code, our values, or applicable law
▪ Act ethically and legally in all business dealings
▪ Report any misconduct or violations as instructed herein.

WHO MUST FOLLOW THE CODE?
OUR CODE APPLIES TO ALL CSG PERSONNEL AND CSG’S BOARD OF DIRECTORS.

WHERE IS THE CODE?
YOU CAN FIND THE CODE ON OUR INTRANET HOMEPAGE, INSIDECSG, UNDER LINKS, CODE OF CONDUCT.
SEEKING GUIDANCE
Our Code addresses the most common legal and ethical issues we might face, but it cannot address every scenario. When making a business decision that has legal or ethical implications, think through the issues and consult other available resources, such as CSG policies and procedures. You can also assess the situation by following the process below.

If you cannot honestly answer yes to all of these questions, seek guidance from representatives in the departments that provide oversight for the policy or law in question, such as Human Resources, Legal, or Compliance. It is important to make decisions we can be proud of and that support legal, ethical, and responsible behaviors. Never be afraid to seek guidance to help navigate gray areas of business conduct before taking action.

CODE DECISION PROCESS

EXPRESSING CONCERNS
We believe in a culture of open and honest communication because this allows us the freedom to be our best. We rely on CSG personnel to understand and abide by the Code, to ask for assistance whenever necessary, and to raise concerns early. If something does not look or feel right, you are encouraged and empowered to ask questions or report suspicions. If you have a concern about a possible violation of the spirit or letter of this Code, company policy, or the law, you are required to take action by:

- Speaking with your manager
- Speaking with any other manager in your reporting hierarchy with whom you feel comfortable
- Contacting CSG’s Global Ethics and Corporate Compliance Office at ethics@csgi.com, the Chief Compliance Officer, or General Counsel
- Using CSG’s ReportLine (where you can file an anonymous report)
- CSG will investigate all reports and take appropriate action. CSG personnel are required to participate in investigations when asked and CSG will safeguard confidentiality throughout the process.

NON-RETALIATION
CSG supports honest and open communication. We encourage CSG personnel to ask questions and report concerns. We will not tolerate retaliation against any individual who, in good faith, discloses any actual or suspected violations or participates in a CSG investigation. Retaliatory acts may result in disciplinary action against the person who retaliated, up to and including termination. If you believe you are a victim of retaliation, please report this concern immediately. For more information, consult our Whistleblowing Policy.
ANONYMOUS REPORTING
You may make an anonymous report by contacting CSG’s ReportLine. An independent third party operates the Reporting Hotline that is available 24 hours a day, 7 days a week. CSG will make every effort to maintain your anonymity.

In rare cases, CSG, the government, or a court may require reporting source disclosure to prosecute and/or punish offenders. Anonymity may also limit CSG’s ability to investigate reported concerns.

Applicable privacy laws protect any personal information revealed during the reporting process.

INVESTIGATIONS
CSG investigates reports of actual or suspected Code violations promptly, fairly, and in accordance with legal obligations. All CSG personnel are required to cooperate fully in any CSG investigation and are expected to keep their knowledge and participation in such investigations confidential to help safeguard the integrity of the investigation, protect witnesses, and secure relevant evidence. We will appropriately protect the confidentiality of all reporting sources.

DISCIPLINARY ACTIONS
Code violations carry serious consequences, including disciplinary action up to and including termination. CSG reserves the right to apply disciplinary action in response to acts of misconduct.

AMENDMENTS OR WAIVERS
The Board of Directors must approve amendments or modifications to the Code. Our Board is also required to authorize waivers of the Code for Board members or executive officers. For all other CSG personnel, requests for waivers must be made in writing and authorized by the General Counsel.

CSG’s Disclosure Committee may report and publicly disclose Code amendments or waivers as required by law.

YOU MAY CONTACT THE GLOBAL ETHICS AND CORPORATE COMPLIANCE OFFICE IN ANY OF THESE WAYS:

REPORTING HOTLINE
PLEASE REFER TO https://www.csgi.com/csg-reportline/
FOR ACCESS TO THE WEBPORTAL AND HOTLINE NUMBERS

EMAIL
ETHICS@CSGI.COM

MAIL
GLOBAL ETHICS AND CORPORATE COMPLIANCE OFFICE
CSG 6175 S. WILLOW DRIVE
GREENWOOD VILLAGE, CO 80111

WEB
https://www.csgi.com/csg-reportline/

KEY POINTS
▪ RAISE CONCERNS EARLY
▪ YOU MAY REMAIN ANONYMOUS
▪ CONFIDENTIALITY IS PROTECTED
▪ RETALIATION IS PROHIBITED

HOW IS THE CODE ENFORCED?
WE APPLY THE CODE, CONDUCT INVESTIGATIONS, AND TAKE REMEDIAL ACTION IN A MANNER THAT IS RESPECTFUL, CONSISTENT, AND FAIR.
RESPECT FOR PEOPLE

RESPECTING HUMAN RIGHTS, VALUING DIVERSITY, PREVENTING HARASSMENT AND DISCRIMINATION

CSG is committed to upholding human rights and seeks to ensure it will not be involved in human rights violations. CSG prohibits in its employment, provision of services and procurement of services the use of all forms of forced labor, bonded labor, child labor, modern forms of slavery and any form of human trafficking as defined by applicable law and as applicable to the jurisdiction in which CSG conducting business. CSG works to ensure compliance with applicable laws regarding wages, workhours, overtime and benefits.

At CSG, we treat others equally and with respect. This includes refraining from hiring or firing employees based on race, color, gender, national origin, age, religion, citizenship status, disability, medical condition, sexual orientation, gender identity, veteran status, marital status, or any other trait protected by law.

It also includes refraining from bullying, harassing, or illegally mistreating CSG personnel in any way. We must ensure our workplace is free from unlawful discrimination and harassment.

While the definition of harassment may vary by locality or country, a common understanding throughout CSG is that it includes any unwelcome conduct that has the purpose or effect of creating an intimidating, offensive, or hostile work environment. Harassment can take many forms, including physical actions, spoken or written remarks, videos, or pictures. Sexual harassment can include unwelcome sexual advances, requests for sexual favors, or other physical or verbal conduct of a sexual nature.

CSG does not tolerate discrimination or harassment. If you experience or become aware of any act of discrimination or harassment, you are required to report it.

For more information, consult our Equal Employment Opportunities Policy and Anti-Harassment Policy.

WHAT IS CSG’S DIVERSITY POLICY?

AT CSG, WE SHOW RESPECT FOR AND VALUE ALL INDIVIDUALS FOR THEIR DIVERSE BACKGROUNDS, EXPERIENCES, STYLES, APPROACHES, AND IDEAS.
PROMOTING A SAFE AND HEALTHY WORKPLACE

At CSG, we are committed to maintaining a safe and healthy work environment for our colleagues, business partners, visitors, and people in our communities. Keeping people safe and healthy is the right thing to do; it supports a core value of promoting a positive, caring work environment in which our people can thrive.

We all share the responsibility to make health and safety a daily priority. Each of us is accountable for observing safety rules, laws, and procedures; abiding by posted safety-related signs; using prescribed safety equipment; and taking precautions in order to protect our colleagues, our visitors, and ourselves.

Each of us is also accountable for observing environmental laws and ensuring our actions do not adversely affect the environment and communities in which we operate.

Acts or threats of violence have no place at CSG and will not be tolerated. Any threatening behavior, even if made in a seemingly joking manner, must be reported in order to protect the safety and security of all our personnel and stakeholders. If you or someone you know is in immediate danger, call local law enforcement authorities before reporting the incident through CSG's reporting channels.

CSG prohibits persons from carrying weapons while performing their jobs, even if they are licensed to carry a weapon. This policy also prohibits weapons at CSG-sponsored events.

ENGAGING IN SOCIAL MEDIA

Everything we say and do affects our reputations as individuals and our shared identity as CSG personnel. Because what we say, email, tweet, blog, or post can reach millions in an instant, we have a profound responsibility to exercise care, personal accountability, and good judgment in social media postings. We must always act in accordance with CSG’s Social Media Policy. CSG has established official, corporate social media accounts to represent the CSG brand and all corporate messaging must be authorized and delivered via these accounts.

HEALTH AND SAFETY: WHAT YOU NEED TO DO

- COMPLY WITH ALL HEALTH AND SAFETY RULES
- REPORT ANY UNSAFE CONDITIONS, ACCIDENTS OR INJURIES
- DO NOT ABUSE ALCOHOL OR DRUGS ON CSG PROPERTY OR WHEN WORKING ON CSG BUSINESS

You must never disclose CSG’s (or our customers’ or vendors’) secret, confidential, proprietary, or privileged information in your personal use of social media.

Always refer media, industry, government, or financial analysts’ inquiries to designated CSG representatives in marketing, corporate communications, or investor relations.

SOCIAL MEDIA: WHAT YOU NEED TO DO

ENSURE THE PRIVACY OF CSG CUSTOMERS’ AND SUPPLIERS’ INFORMATION.
DON’T SPEAK ON BEHALF OF CSG UNLESS YOU’RE AUTHORIZED TO DO SO.

AVOIDING CONFLICTS OF INTEREST

An uncompromising commitment to integrity is a core CSG value and guiding principle for every decision. This means we make decisions based on unbiased, sound judgement rather than for personal gain. Even the appearance of a conflict of interest can cause others to think we are acting improperly and should be avoided. Conflicts of interests can be mitigated or resolved if promptly disclosed and properly managed.

A conflict of interest occurs when a personal interest interferes with our ability to make sound, objective business decisions. While it is impossible to address every situation where a real or perceived appearance of bias may arise, here is guidance for the following three most common situations.
GIFTS AND ENTERTAINMENT
Offering and accepting business gifts, favors, and entertainment is a customary business courtesy that can promote goodwill and enhance business relationships. However, gifts, favors, and entertainment should never affect, or appear to affect, impartial business decision-making by CSG or any outside party. Gifts, favors, or entertainment should never be offered or received in exchange for preferential treatment in any business dealing.

Always avoid giving or receiving gifts, favors, or entertainment if the exchange could impair, or appear to impair, anyone’s ability to make an impartial decision. Only gifts of nominal value are acceptable. When giving gifts or entertainment, we must not create a conflict of interest. Gifts may only be given infrequently and their value must be modest.

You may not give business gifts or entertainment:
▪ To influence a business decision
▪ With the expectation of receiving anything of value in return
▪ That exceed accepted business practices.

If you receive a gift that is not of nominal value, consult Compliance for guidance and approval before accepting it. Board members must consult with the Chair of the Audit Committee before accepting gifts or entertainment.

Gifts or business entertainment provided to other parties should also receive clearance from Compliance to the extent that there are any questions concerning legality or appropriateness.

Cash or cash equivalents are never acceptable business gifts unless specifically permitted by Compliance or the Audit Committee.

For More Information
Please also refer to PREVENTING BRIBERY AND CORRUPTION on page 17.

RELATIVES AND FRIENDS
In order to prevent an actual or perceived conflict of interest, it is important to avoid situations where judgment and decision-making could be improperly influenced by close personal or family relationships. It is not appropriate to:
▪ Supervise someone with whom you have a close personal, romantic, or familial relationship
▪ Place colleagues who have a romantic or family connection in a reporting relationship
▪ Be involved in selecting or hiring someone with whom you have a close personal, romantic, or familial relationship
▪ Participate in the selection or relationship management of a business partner if the firm employs someone with whom you have a close personal relationship.

Finally, engaging CSG in a direct or indirect business relationship with a family member or with a company in which a family member is a partner, officer, or director must be reviewed and approved in advance by Compliance.

WHO IS A FAMILY MEMBER?
FAMILY MEMBER IS DEFINED AS YOUR SPOUSE, DOMESTIC PARTNER, PARENT, CHILD, SIBLING, PARENT-IN-LAW, BROTHER OR SISTER-IN-LAW, SON-OR DAUGHTER-IN-LAW, OR ANYONE WHO RESIDES IN YOUR HOME.
OUTSIDE EMPLOYMENT AND OTHER ACTIVITIES
Living a full and productive life outside CSG is encouraged. We understand that diverse experiences promote well-being, personal mastery, and possibly even drive innovations for the CSG team. Outside activities such as your own business, a second job, and community work are all acceptable as long as these activities do not:

- Interfere with your CSG job responsibilities or performance
- Involve working for a customer, competitor, or supplier
- Risk damaging CSG’s business or reputation
- Use company resources, including time, assets, other CSG personnel, or vendors
- Create any other kind of conflict of interest.

The following scenarios can help you understand what may constitute a conflict of interest:

- Performing work for businesses that offer, manufacture, or sell products or services which compete with or are similar to CSG’s products or services
- Entering into personal transactions with our suppliers or customers other than on terms and conditions available to the public or CSG personnel, unless approved in advance by Compliance or the Audit Committee
- Competing with CSG for the purchase or sale of property, services, or other interests
- Serving as an officer or a general managing partner of a company that does business with CSG without requesting prior approval from Compliance and the Nominating and Corporate Governance Committee of the Board of Directors
- Investing in customers, suppliers, or competitors if they are not publicly traded on a national securities exchange or traded on the over-the-counter market.

CONFLICT OF INTEREST: WHAT YOU NEED TO DO
IF YOU THINK YOU MIGHT HAVE A CONFLICT OF INTEREST, ACT PROMPTLY. NOTIFY YOUR VP, YOUR HUMAN RESOURCES REPRESENTATIVE OR THE COMPLIANCE OFFICER.
IF IN DOUBT, ASK.

Executive officers and members of the Board of Directors must refrain from participating in any relationship that could affect their independence as CSG directors. For more information, including required approvals for outside commitments, consult our Conflicts of Interest Policy.

PERSONNEL PRIVACY
CSG respects the privacy of our personnel. We collect and retain personal information only as is necessary for the effective operation of CSG or as required by law. We keep that information confidential and release it only to those who have authorization based on a business-related need or an individual’s specific permission. For more information, consult our Privacy Policies and Binding Corporate Rules (BCRs).
ASSET STEWARDSHIP

MAINTAINING ACCURATE FINANCIAL RECORDS

We rely on the integrity and accuracy of our business and financial records both for internal decision-making and for the benefit of investors, government agencies, regulators, and others to whom we report. Accurate and transparent recordkeeping protects our reputation, promotes organizational efficiency, and helps us meet legal and regulatory obligations.

All of us, not only those working in finance and accounting roles, have a responsibility to ensure the integrity, accuracy, and effectiveness of our recordkeeping. Responsible financial recordkeeping best practices include:

- Accurately recording all assets, liabilities, revenues, and expenses
- Following all internal control procedures
- Never creating fictitious journal entries, such as submission of bogus time or expense reports, petty cash disbursements, or independent contractor timesheets
- Never altering any documents or submitting documents signed by an individual lacking proper authority
- Never establishing unsupported reserves or accruals.

Our executive officers have greater responsibilities. They must ensure that we present full, fair, accurate, timely, and understandable financial information in CSG’s reports and filings with the Securities and Exchange Commission (SEC), and in all public communications. Furthermore, executive officers are required to:

- Ensure internal controls are implemented effectively and report or resolve weaknesses that could impact the accuracy of financial disclosures or reports
- Inform the CSG Disclosure Committee of transactions, events, or circumstances that could affect CSG’s financial reports
- Fairly and accurately represent facts or circumstances when interacting with our auditors or people who prepare CSG’s financial statements
- Ensure that individuals who perform accounting or financial reporting functions know and adhere to these principles.

Personal and professional integrity is a non-negotiable attribute of all CSG personnel. Everyone must report accounting or auditing irregularities; violation of laws, rules, or regulations; fraud; and deficiencies in our internal controls that could affect or render untrue the information contained in our public communications or reports filed with the SEC or other regulatory body. These matters will be reported to the Audit Committee in accordance with CSG policies, procedures, legal requirements, and stock exchange listing standards.
SAFEGUARDING OUR REPUTATION AND OTHER ASSETS
We all share the responsibility to be good stewards of company assets, taking care to avoid loss, theft, damage, waste, and improper use.

PROPRIETARY AND CONFIDENTIAL INFORMATION
One of CSG’s most important assets is the knowledge and information we have developed to deliver products and services to our customers. CSG owns this knowledge, referred to as proprietary information.

Examples of proprietary information include trade secrets, patents, trademarks, copyrights, business research, new product plans, objectives, strategies, customer or supplier lists, and any unpublished financial or pricing information.

Information may also be classified as confidential if CSG wishes to protect it from disclosure to third parties or is obligated to protect it because it was received from a customer or vendor.

CSG personnel are required to adhere to the confidentiality and inventions assignment agreement executed at the time of employment with CSG.

We must also exercise care and respect for the confidential information of others. Do not bring confidential material from prior employers to CSG or use that confidential information while working for CSG. Do not permit others to do so. Do not solicit confidential information from another company’s present or former employees.

CLIENT DATA PRIVACY
CSG is committed to ensuring that the private data for which we are responsible is processed in accordance with worldwide data privacy regulations. CSG diligently complies with all applicable privacy laws and we collect, use, and process personal data only to the extent necessary to fulfill our contractual commitments to our clients and applicable privacy laws. CSG’s Privacy Policies and Binding Corporate Rules (BCRs) express our commitment to maintaining the privacy of personal information that CSG receives in connection with providing services to our clients.

To fulfill CSG’s commitments to our clients you must be familiar with and adhere to CSG’s Privacy Policies and Binding Corporate Rules.

USING EQUIPMENT, INFORMATION, AND COMMUNICATIONS SYSTEMS RESPONSIBLY
We must be judicious and responsible in our use of CSG’s information systems and communications equipment. We must protect company data from accidental or unauthorized disclosure, misuse, improper alteration, or destruction by using the security controls and measures established by CSG and documented in our Information Security Management System and related procedures and policies. These measures and controls are based on legal, regulatory, and customer contractual requirements, and are designed to preserve the confidentiality, integrity, and availability of CSG services.

Personal use of company telephones, computers, faxes, photocopiers, and network bandwidth is acceptable if it is incidental and infrequent, but this privilege must not be abused.

ASSET PROTECTION: WHAT YOU NEED TO DO
- PROTECT ALL TYPES OF CSG ASSETS: FINANCIAL, INFORMATIONAL, PHYSICAL, AND TECHNOLOGICAL
- KEEP ALL CONFIDENTIAL INFORMATION SAFE AND COMPLY WITH NON-DISCLOSURE OBLIGATIONS
- DO YOUR PART TO ENSURE CSG BOOKS, RECORDS, AND ACCOUNTS ARE CLEAR, COMPLETE, TRUTHFUL, AND ACCURATE.
We strictly prohibit the use of CSG systems (including cellular, mobile, wireless, email, instant messaging, the internet, or intranet) for activities that are unlawful, unethical, or otherwise contrary to company policy or this Code. Some examples of inappropriate usage are:

- Access to content or communication that is pornographic, obscene, sexually explicit, offensive, harassing, threatening, abusive, profane, derogatory, or discriminatory
- Violation of others’ intellectual property rights
- Practices that place company information or assets at risk or interfere with productivity
- Activities that incur significant additional costs to the company.

Users of company-provided services and equipment have no reasonable expectation of privacy except for that which is provided by local data privacy regulations. CSG may review and monitor your activity to ensure resources are used only as allowed. CSG reserves the right to block access to offensive materials, inappropriate websites, and the transmission of inappropriate emails or files. For more information, consult our Acceptable Use Policy.

INFORMATION SECURITY: WHAT YOU NEED TO KNOW

CSG has legal and commercial responsibilities with regard to information security, whether that information is proprietary, personal, or customer-related. Compliance with our policies is audited internally and externally.

INFORMATION SECURITY IS THE PRESERVATION OF:

- **Confidentiality** – Ensuring that information is accessible only to those authorized to have access
- **Integrity** – Safeguarding the accuracy and completeness of information and processing methods
- **Availability** – Ensuring that authorized users have access to information and associated assets when required and necessary to support their respective jobs.

For more information, consult our Acceptable Use Policy.

COMPANY LOANS

CSG will not make loans to employees, executive officers, or members of the Board of Directors without prior approval from the Board.

RECORDS RETENTION

We must properly maintain our records by following the requirements of our Data Retention and Destruction Policy. On occasion, Legal will issue a legal hold when we need to preserve documents relevant to a lawsuit or government investigation.

When a legal hold is put in place, Legal will inform you which documents must be retained. Documents subject to a legal hold may not be destroyed, altered, or modified. When the hold is released, you will receive a notice from Legal, at which time you may dispose of the documents as outlined in the Data Retention and Destruction Policy.
AVOIDING INSIDER TRADING AND MARKET ABUSE

Insider trading — trading CSG’s securities while in possession of material, non-public information about CSG — is a violation of our Code and United States securities laws. The same prohibition applies to trading the securities of another company with which we do business, when you have material, non-public information about that company. Information is material if an investor would consider the information important when deciding to buy, sell, or hold that company’s securities.

Information is non-public until it has been disclosed and adequate time has passed for the securities markets to digest the information. Examples of material, non-public information include:

- Advance notice of changes in senior management
- Unannounced mergers or acquisitions
- Large contract extensions/renewals and large purchases of products or services
- Pending or threatened litigation
- Non-public financial results or an unannounced stock split
- Development of a significant new product
- Major shifts in an organization’s strategy.

Tipping is also a violation of our Code. It involves disclosing material, non-public information about CSG to an individual who then acts on that information by trading CSG securities. You should also refrain from discussing material, non-public information with other CSG personnel unless they have a business need to know.

If you have questions about information you possess or insider trading, consult our Stock Trading Policy or contact Compliance. The objective of our policy is to minimize the potential that any CSG personnel will make a decision to buy, sell, or hold CSG’s securities based upon material, non-public information. Even the appearance of impropriety is unacceptable when it relates to CSG personnel trading in company stock. Because we maintain strict adherence to the legal restrictions on insider trading, there will be occasions when we cannot disclose information to the CSG population at large.

In addition, there may be times when you are individually entrusted with sensitive information in the ordinary performance of your duties. During these times, we expect you to guard the confidentiality of the information you possess. We also ask for your patience and understanding when we cannot disclose such information to you.

TRADING DURING BLACKOUT PERIODS

CSG personnel and members of our Board of Directors may not buy or sell CSG securities during the Blackout Period. The Trading Blackout Period is the period starting on the 16th calendar day of the final month of each fiscal quarter and ending after one business day following the public disclosure of the financial results for that quarter.

INVESTOR AND MEDIA INQUIRIES

In order to present information to the media, industry, and financial analysts with one consistent voice, always refer media, industry, government, or financial analysts’ inquiries to designated CSG representatives in marketing, corporate communications, or investor relations.

INSIDER TRADING: WHAT YOU NEED TO KNOW

INSIDER TRADING AND TIPPING ARE SERIOUS VIOLATIONS OF UNITED STATES SECURITIES LAWS AND WILL EXPOSE INDIVIDUALS INVOLVED TO IMMEDIATE TERMINATION, AS WELL AS POTENTIAL CIVIL AND CRIMINAL PROSECUTION. CONSULT OUR STOCK TRADING POLICY FOR MORE INFORMATION.
RESPECT FOR OUR MARKETPLACE

MAKING COMMITMENTS AND OBTAINING APPROVALS
Authority to bind CSG to written contractual commitments is limited strictly by our Customer and Vendor Contract Policies. This policy governs conflict between the policy and rights associated with an employee’s position or title that arises by law or cultural custom. Therefore, even if you are a managing director, president, or other officer of any one of the legal entities within the CSG group, your actual authority is determined by CSG’s policies and/or the express terms of your employment contract or offer letter. Never sign any documents, otherwise commit CSG, or authorize any action on CSG’s behalf, unless you are specifically authorized to do so. Know the limits on your authority and don’t take any action that exceeds those limits.

CSG personnel may not participate in any verbal or written side agreements that are not included in an authorized contract. When you make an agreement on CSG’s behalf for work or the delivery of products and services, you must put the contract in writing. Whenever a contract is created, it must be reviewed and/or authorized by our Legal Department in accordance with our Customer and Vendor Contract Policies. CSG personnel are responsible for seeking advice from the Legal Department in the event of any uncertainty regarding obtaining approvals or making commitments on behalf of CSG.

CONTRACTS: WHAT YOU NEED TO KNOW
A CONTRACT CAN INCLUDE, BUT IS NOT LIMITED TO, AN AGREEMENT, LETTER OF AGREEMENT, AMENDMENT TO AN EXISTING CONTRACT, WORK ORDER, STATEMENT OF WORK, OR PURCHASE ORDER.

COMPETITIVE INTELLIGENCE
Gathering information about our competitors’ products is necessary for us to sustain and grow our business, but we must ensure we acquire information in a legal, ethical, and respectful manner. If a coworker, customer, or business partner has competitive information that they are required to keep confidential, do not encourage them to disclose it.

If you become aware that confidential information about another company has been inadvertently disclosed, seek guidance from Legal before using or acting on this information. In addition, some of us may receive confidential information from business partners and suppliers. We must safeguard this information and honor all contractual commitments. This means we also protect third-party intellectual property, such as inventions and software, from disclosure or misuse. This obligation continues even after employment ends, as stated in the Confidentiality Agreement you signed when you were hired by CSG.
FAIR DEALING
CSG is committed to fair dealing, meaning we deal fairly with business partners, suppliers, and competitors at all times. This includes, but is not limited to:

▪ Providing honest and truthful information to our customers, business partners, suppliers, competitors, and the public, to ensure they are not misled

▪ Not using illegal or unethical actions, including but not limited to manipulation, concealment, bullying, harassment, abuse of privileged information, or misrepresentation of facts

▪ Not giving or receiving illegal gifts or payments to gain or maintain a business or other advantage.

PROMOTING FAIR COMPETITION
When conducting business on CSG’s behalf, we must act in accordance with antitrust and fair competition laws. These laws safeguard competition by prohibiting agreements and practices that restrict trade.

Some prohibited practices include discussing with competitors or customers the allocation of markets, territories, or customers, or making agreements pertaining to price-related information. If a competitor raises these issues in a conversation, report the incident to Compliance. Be particularly careful at industry events or association meetings to avoid even the slightest appearance of unfair business practices. Antitrust laws can be complex, and violations may subject CSG and individuals to criminal sanctions, including fines, jail time, and civil liability. If your job involves marketing, purchasing, sales, or contact with our competitors, it is especially important for you to familiarize yourself with antitrust and fair competition laws.

DOING BUSINESS GLOBALLY
As a global company doing business around the world, CSG is committed to complying with applicable laws governing international trade and regional or local laws wherever we conduct operations.

WHAT ABOUT INTERNATIONAL TRADE?
CSG COMPLIES WITH ALL APPLICABLE INTERNATIONAL TRADE LAWS IN THE COUNTRIES IN WHICH WE OPERATE, INCLUDING EXPORT CONTROLS, ECONOMIC SANCTIONS, AND ANTI-BOYCOTT LAWS. WHEN CONDUCTING BUSINESS ON BEHALF OF CSG, YOU ARE REQUIRED TO ACT IN ACCORDANCE WITH OUR INTERNATIONAL TRADE POLICY.

We also understand that United States law applies to many of our relationships and transactions worldwide. Our Code embodies our commitment to abide by higher standards of ethics and conduct than what may be minimally required in any particular country or region.

While the laws of a particular country may not carry the same requirements or prohibitions as are contained in this Code, because other countries’ laws do, we all agree to conduct ourselves according to the standards in the Code. If you believe a conflict has arisen between local law and the provisions of this Code or company policy, please notify Compliance immediately. Compliance will give you the guidance necessary to resolve a particular situation.

ECONOMIC SANCTIONS, EXPORT CONTROLS, AND ANTI-BOYCOTT LAWS
As a global company, CSG conducts business and delivers products and services in multiple countries. Many countries, including the United States, regulate international trade transactions — exports, imports and international financial transactions — for national security and foreign policy purposes.
In some instances, international trade laws such as economic sanctions laws and embargo provisions may prohibit all transactions, including the provision of goods, software, technology, or services and/or financial transactions, with a targeted country or person without a license.

Exporting goods and/or providing services without the necessary government approvals can result in revocation of CSG’s export privileges, and individuals could face civil and criminal penalties. If you are involved in the transfer of goods or services across national borders on behalf of our company or our customers, you must comply with these laws, regardless of where you are located. If United States law conflicts with a local trade law, United States law may apply. For more information, consult our International Trade Policy.

If in doubt, always consult with Compliance for proper guidance on this subject. We must follow all applicable United States and international trade control laws and regulations regarding licensing, shipping documentation, import documentation, reporting, and record-retention.

The United States and other countries prohibit cooperation with boycotts or embargoes against countries or persons that have been blacklisted by other governments or by groups. Examples of such laws include the United States’ prohibition on cooperation with and participation in the Arab League’s boycott of Israel and Canada’s and the European Union’s laws relating to the United States’ sanctions against Cuba. Such provisions can give rise to a conflict of laws. Seek guidance from Compliance if you have a concern about a trade-related issue.

PREVENTING BRIBERY AND CORRUPTION
We do not tolerate any form of corruption (bribery, kickbacks, fraud, etc.). We believe corruption harms our company, our reputation, and the communities where we do business. This perspective aligns with law everywhere we operate and enhances stakeholder confidence in our management practices.

We hold our business partners and their representatives to the same high standards of business integrity to which we hold ourselves.

We strictly prohibit corrupt practices in our business anywhere in the world. Furthermore, we do not retain third parties to engage in any activity in which we are prohibited from participating ourselves.

GIFTS TO GOVERNMENT OFFICIALS
Gifts may not be given to a government official without express prior permission from Compliance. Even if you think the item is of nominal value, you must seek and receive permission prior to its presentation. If a foreign government official requests money or anything of value, immediately report the incident to Compliance. Gifts or meals should not be provided to city, county, or state officials regardless of size or value. Many county, state, and local jurisdictions prohibit government officials from accepting any type of gift, even one of nominal value. Violating these laws can subject CSG and the responsible individuals to fines and penalties. If you have questions about gifts and entertainment, consult our Anti-Corruption and Anti-Bribery Policy or contact Compliance.

**ANTI-CORRUPTION: WHAT YOU NEED TO KNOW**

▪ KNOW AND COMPLY WITH CSG’S TRAVEL AND EXPENSE POLICY
▪ REMEMBER THE RULES ARE STRICTER FOR INTERACTIONS WITH GOVERNMENT OFFICIALS
▪ NEVER GIVE OR ACCEPT BRIBES
▪ IF YOU WANT TO HIRE A CONSULTANT, AGENT OR REPRESENTATIVE, BE SURE YOU COMPLY WITH CSG’S THIRD PARTY DUE DILIGENCE PROCEDURE.

**CORRUPTION** IS THE ABUSE OF ENTRUSTED POWER FOR PERSONAL GAIN. A **BRIBE** OCCURS WHEN SOMEONE GIVES OR PROMISES ANOTHER PERSON SOMETHING OF VALUE TO OBTAIN FAVOURABLE TREATMENT. **KICKBACKS** INVOLVE GIVING OR RECEIVING PERSONAL PAYMENTS AS REWARD FOR THE AWARDING OF A CONTRACT OR OTHER FAVOURABLE OUTCOME OR BUSINESS TRANSACTION. BRIBES AND KICKBACKS OF ANY KIND ARE UNETHICAL, VIOLATE THIS CODE, AND ARE ILLEGAL.
RESPONSIBILITY TO THE COMMUNITY

POLITICAL CONTRIBUTIONS AND ACTIVITIES
As individual citizens, we are free to participate in political activities and make political contributions on our own behalf. However, we should never do so with the intent or expectation that CSG will obtain or retain business as a result. In addition, we may not take part in political activities on company time or using CSG resources.

PROTECTING THE ENVIRONMENT
CSG is committed to meeting or exceeding the requirements and standards specified in environmental laws, rules, and regulations. We are also committed to employing environmentally sound practices in our business operations. If you are aware of a practice that is harmful to the environment or does not comply with CSG policies or governing laws, rules, and regulations, please contact Compliance.

VOLUNTEERING
CSG is committed to being active in communities where we live and work, and to making a difference in the lives of people who need our help. We participate in community events ranging from Toys for Tots to Habitat for Humanity to Community Blood Drives, and we are proud of the time and effort we contribute.

Employees who want to volunteer on Company time must obtain prior approval from their managers.

WHERE IS THE CODE?
YOU CAN FIND THE CODE ON OUR INTRANET HOMEPAGE, INSIDECSG, UNDER LINKS, CODE OF CONDUCT.

FURTHER GUIDANCE AND CONTACT INFORMATION

CSG corporate policies, processes, and procedures referenced in this Code are summaries of more comprehensive policies available on our intranet within our Global Quality Management System (GQMS). Consult them often and raise any concerns you might have with your manager, Human Resources, or our Global Ethics and Corporate Compliance Office. This Code and our company policies, processes, and procedures act as a guidebook to continued success; our reputation depends on each of us acting ethically, responsibly, and in compliance with the law and CSG policies at all times.

ETHICS REPORTING HOTLINE
You may make an anonymous report by contacting CSG’s ReportLine, which is operated by an independent company, and available 24 hours a day, 7 days a week.

Please refer to the ReportLine for access to the online portal and internal numbers.

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