



# CSG Modern Slavery Statement



# CSG Modern Slavery Statement

## INTRODUCTION

### Preface from CEO Brian Shepherd

Integrity is the foundation of our success. By conducting business with integrity, we earn the trust of our customers, stakeholders, suppliers and partners. For us, doing what is right is the only way to do business.

While we value results, we are committed to achieving results responsibly through ethical, moral and legal business practices. Guided by our [Social Impact](#) work, we strive to help create a better, more future-ready world.

Our commitment to fair and equitable business practices means that we will not tolerate illegal or unethical behavior and we will never compromise on our actions. This is our pledge to our customers, employees, suppliers, shareholders and communities.



**Brian Shepherd**  
President and Chief Executive Officer



# CSG's Business

This Modern Slavery Statement (**Statement**) is a joint statement made pursuant to the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) by CSG International Pty Ltd ABN 33 082 026 551 (CSG AU) related entities and subsidiaries including in other jurisdictions as follows:

- CSG International Australia Pty Ltd (ABN 63 090 853 704);
- DGIT Systems Pty Ltd (ABN 26 113 945 449);
- DGIT Holdings Pty Ltd (ABN 26 621 305 431);
- Inomial Pty Ltd (ABN 94 088 172 301);
- DGIT NZ Limited "DGIT NZ" [NZBN 9429041405864] (Owned by DGIT Systems Pty Ltd); and
- PT DGIT Systems Indonesia "DGIT Indonesia" (Owned by DGIT Holdings Pty Ltd and DGIT Systems Pty Ltd).

This Statement is also made in accordance with the UK Modern Slavery Act 2015 on behalf of Independent Technology Systems Limited [Company number 03179314] (**CSG UK**) and its related entities as follows:

- CSG Systems UK Limited [Company number 07382973]; and
- Intec Telecom Systems Limited [Company number 03931295].

Throughout this Statement CSG AU, CSG UK and their respective related entities and subsidiaries are referred to collectively as "CSG", "we", "our" or "us" (unless otherwise distinguished).

This outlines the steps we have taken during the reporting year ended 31 December 2022 to understand and address modern slavery as defined by the Modern Slavery Act (**Modern Slavery**) risks in our operations and global supply chain.

## Our Values

CSG is a global, purpose-driven Software as a Service (**SaaS**) company dedicated to our people, our planet and the communities where we do business. As part of our commitment to human rights, we act with integrity in everything we do by adhering to the United Nations Guiding Principles and Universal Declaration on Human Rights.

We are committed to ensuring our business practices protect workers from Modern Slavery in our operations and across our supply chains. Our risk-based controls mitigate the risk of modern slavery, enabling us to comply with applicable local laws where we operate. Outside of our own operations, we expect our business partners and suppliers to do the same including by complying with our policies, codes and governance practices.

In this Statement, we explain the steps taken by CSG to understand and address any potential Modern Slavery risk.

# Our Structure, Operations and Supply Chain

## STRUCTURE

CSG AU is an incorporated company in Australia and is the parent company of a number of Australian subsidiaries.

CSG AU and CSG UK are part of an international corporate group, including CSG Systems International Inc., with headquarters in Colorado, United States.

Globally, CSG employs more than 5,700 employees located in more than 20 countries either as full-time or part-time. Our global workforce consists of: 41% in North America, 7% Central & South America, 10% Africa, Europe & Middle East, and 42% Asia-Pacific (4% Australia [approximately 200 employees]). For more information regarding our global workforce, please see the [2022 Impact Report](#).

## OPERATIONS

CSG is one of the world's leading revenue management and digital monetisation, customer experience and payment solutions providers, and a trusted partner to some of the most well-known companies around the globe. We leverage more than 35 years of experience to help our clients simplify the complexity of a rapidly changing business landscape.

The majority of CSG's international offerings are managed services and technology solutions. We provide technology based services to our clients to deliver a streamlined approach to customer experiences and payment solutions. CSG uses developers to create and support the software that forms the backbone of its solutions and procures supporting software from third-party vendors.

Within the United States, CSG also provides print and mail services. For our print and mail services, we procure production hardware and other tangible inputs from vendors and suppliers who are primarily based in the United States.

## SUPPLIERS

Our main suppliers in both CSG UK and CSG AU provide us with technology and technology related services. Both CSG UK and CSG AU receive services from other CSG service centers globally (Brazil, India, Indonesia, and Malaysia); however, we source in country when possible. CSG AU specifically primarily sources locally.

[CSG's Supplier Code of Ethics and Business Conduct](#) is part of our expectations of suppliers and business partners to treat people fairly and with respect and to provide all workers with a safe, secure, and healthy working environment.

# Risk of Modern Slavery Practices

Given the nature of our business as a software company, we consider our supply chain and operations to be low risk in respect of causing, contributing or being directly linked to Modern Slavery. CSG’s sourcing activities are focused on procuring professional services and equipment to support CSG’s workers and operations related to technology development.

In terms of our equipment suppliers, as noted above, we source in country when possible and CSG AU specifically primarily sources locally.

Additionally, we are not involved in manufacturing or other high risk industries for Modern Slavery. CSG UK and CSG AU do not have complex supply chains nor vendor relationships significantly dependent on contingent, seasonal or migrant workers. Our supply chains are predominantly locally based in each jurisdiction in which we operate, and we have long-term relationships with our suppliers that comply with our [CSG’s Supplier Code of Ethics and Business Conduct](#).

Despite the lower-risk nature of our business, we understand that there remains Modern Slavery risks in our supply chains and operations including:

- location and sources of goods and services;
- types of goods and services supplied to us;
- use of contractors or service providers including labor hire and outsourcing or third party contracting arrangements; and
- increased global operations, which create Modern Slavery risks.

We are committed to working to understand and address any risks of Modern Slavery in our supply chain and in our operations.

CSG UK and CSG AU focus on a risk-based approach in assessing relevant risks to our business areas, technology products and business processes. Currently our risk assessment reviews several factors in our operations and supply chains such as industry, geographic location or region, and business model as set out below.

# Our Actions Taken to Assess and Address Modern Slavery

## GOVERNANCE AND RISK MANAGEMENT

CSG’s Enterprise Risk Management program evaluates the risks related to Modern Slavery practices in its business operations and supply chain including when considering expansion into new geographies and industries.

In addition, CSG’s Global Compliance and Ethics team conducts a program level risk assessment, which includes a review of risks specific to human rights, including Modern Slavery.

The assessments help to inform opportunities to enhance our processes and controls to mitigate the risk of Modern Slavery in our business and supply chains.

## POLICIES

CSG has the following policies that reflect CSG’s position and its approach to the identification of Modern Slavery risks and the steps to be taken to prevent Modern Slavery in its operations:

- **CSG Code of Ethics and Business Conduct:** Our Code of Ethics and Business Conduct ensures continued integrity of our business dealings. Our Code of Conduct outlines the behavior necessary to uphold CSG’s high ethical standards, including our commitment to human rights, employee health and safety, and workplace behavior. New hires are required to provide an affirmation that they have read and understand the Code of Conduct, will comply with it, and will report suspected violations as required by the Code. All employees are required to complete periodic training and provide a new affirmation annually. Compliance with these requirements is a condition of employment.
- **Human Rights Policy:** CSG is committed to doing business with integrity. Respect for human rights is a fundamental value of CSG. We strive to respect and promote human rights in accordance with the Principles of the United Nations Global Compact on Business and Human Rights in our relationships with our employees, customers, suppliers, partners and other third parties with whom we interact. Additionally, CSG has a commitment to employees being paid a living wage; CSG regularly reviews market conditions, pay compliance, local labour laws and compensates its employees in excess of the minimum requirements provided by law in the jurisdictions where our employees work.
- **Compliance Reporting Policy:** CSG takes all forms of non-compliance with our Code of Conduct very seriously. This policy is designed to assist any employee who has knowledge of non-compliance by providing a process by which relevant issues can be reported confidentially and without fear of retaliation or victimisation. This includes the reporting of any circumstances that may give rise to any risk of Modern Slavery. We have in place a Compliance team that reviews and

investigates reports on non-compliance with our Code of Conduct. The [CSG ReportLine](#) offers toll and toll-free telephone numbers and a web portal through which confidential and anonymous reports can be made. The CSG ReportLine is managed by an external, independent third-party provider and is available 24 hours a day, 7 days a week to anyone globally.

### SUPPLIER ADHERENCE TO OUR VALUES AND ETHICS

To ensure that all those in our supply chain comply with our ethical standards, we are taking the following measures:

- **Supplier Code of Ethics and Business Conduct:** 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 throughout every business relationship. CSG expects all of its agents, consultants, contractors, distributors and suppliers, as well as their respective employees, agents and subcontractors, to operate under the same high standards while conducting business on CSG’s behalf. CSG has instituted a Supplier Code of Conduct that embodies CSG’s key principles, including its expectations that suppliers will abide by applicable human rights laws and Modern Slavery laws. Any agent, consultant, contractor, distributor or supplier who has knowledge of non-compliance of the Supplier Code of Conduct or CSG Code of Conduct can report confidentially and without fear of retaliation using the same [CSG ReportLine](#) mentioned above. This includes the reporting of any circumstances that may give rise to any risk of Modern Slavery. We have an Ethics and Compliance team that reviews and investigates reports on non-compliance in respect of both Codes of Conduct.
- **Third Party Due Diligence Procedure:** CSG believes in conducting business with honesty and integrity, complying with all laws and regulations of the countries in which we operate that are applicable to CSG business operations. We endeavor to choose reputable business partners who conduct their business with high ethical standards. CSG conducts a third-party vendor review process which enables CSG to identify, evaluate and mitigate the risks associated with third parties with whom we engage in business as well as comply with applicable law.
- **Global Strategic Sourcing Policy:** The Global Strategic Sourcing Policy sets out minimum required standards and actions related to acquisition of third party goods and services to ensure best practices approach using a Strategic Sourcing method. CSG engages a wide range of vendors which touch many parts of the organisation. This policy is designed to ensure that CSG, through relevant organisational stakeholders, is able to assess its vendors and any risks that they may present to the company prior to the execution of an agreement with the vendor.

### TRAINING

To ensure an increased level of understanding of the risks of Modern Slavery in our supply chains and our business and to aid our employees in identifying “red flag” situations, CSG requires that certain employees take training on Modern Slavery periodically. In addition, CSG is committed to fostering an environment in which open communication is encouraged and regularly conducts internal training for employees to support a “speak up” culture and promote options for reporting misconduct or unethical behaviour.

# Assessing Effectiveness of Our Actions

We will continuously monitor CSG suppliers and operations across jurisdictions in which we operate to assess the effectiveness of our governance structure including the policies and codes, programs and controls implemented to mitigate the risk of modern slavery in our operations and supply chains. This includes but is not limited to:

- Undertaking regular reviews of our internal governance processes;
- Establishing timeframes to monitor the implementation of risk-based measures;
- Tracking of relevant suppliers for negative media, watch lists, and blacklists using a third-party screening and monitoring tool;
- Evaluating relationship with suppliers on an ongoing basis;
- Reporting mechanisms available to CSG employees and suppliers for potential instances of Modern Slavery including tracking reporting.

Credible reports of actual or suspected violations of Modern Slavery laws or related CSG policies and procedures are escalated to the appropriate CSG individuals for assessment. Reported data is analysed and tracked to measure the impact and effectiveness of our program as well as identify trends. In addition, any remediation items identified as a result of an assessment will be tracked and monitored to completion.

In addition, CSG conducts periodic enterprise and program-level risk assessments to evaluate the controls and actions taken to mitigate the risk of modern slavery. This assessment includes a review of the following to assess CSG’s current response to modern slavery:

- Report and screening data noted above
- Regulatory, business, or socioeconomic changes that may impact the risk of Modern Slavery
- Applicable trainings, policies and procedure documents





## Consultation

This statement was prepared by teams representing all of the related entities covered by this Statement. The global compliance, procurement and directors of each entity in this Statement engaged and consulted with each other in preparing the statement. Each entity owned and controlled regarding this Statement is aware of our global approach to modern slavery and are subject to the same policies and procedures set out in this statement. As part of the review with the Compliance and Procurement teams, work practices and supply chains were reviewed to ensure compliance.

## Approval

This joint statement is made by CSG UK in accordance with the requirements of section 54(2) of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015 in the UK, and by CSG AU in accordance with the requirements of section 14 of the Modern Slavery Act in Australia.

This joint statement was approved by the Board of Directors of CSG International Pty Ltd ABN 33 082 026 551 and on behalf of the related entities conducting businesses in the UK, Indonesia, New Zealand and Australia, as detailed above, and is signed effective 30 June 2023, for the fiscal year ending 31 December 2022.

### **Shane McCaffery**

CSG International Pty Ltd ABN 33 082 026 551

### **Philip Vitale**

Independent Technology Systems Limited  
[Company number 03179314]