CPI CARD GROUP INC.
INSIDER TRADING POLICY

CPI Card Group Inc. (the "Company") and its Board of Directors have adopted this Insider Trading Policy (this "Policy") both to satisfy our obligation to prevent insider trading and to help you avoid the severe consequences associated with violations of insider trading laws. This Policy also is intended to prevent even the appearance of improper conduct on the part of anyone employed by or associated with the Company.

Scope of Policy

Persons Covered. This Policy applies to all directors, officers, employees, agents and consultants of the Company and its subsidiaries and affiliated companies. In this Policy, references to "you" include:

- your family members who live in your household;
- anyone else who lives in your household;
- any family members who do not live in your household but whose transactions in securities are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in securities);
- any person to whom you have disclosed "material nonpublic information"; and
- any person acting on your behalf or on behalf of any individual listed above.

You are responsible for making sure that the purchase or sale of any security covered by this Policy by any such person complies with this Policy.

Securities Covered. This Policy applies to purchases and sales of the publicly traded securities of the Company, including the Company's common stock and any other securities that the Company may issue from time to time that are publicly traded. In addition, this Policy applies to purchases and sales of the publicly traded securities of other entities, including customers or suppliers of the Company and other entities with which the Company may be negotiating major transactions (such as an acquisition, investment or sale of assets).

Statement of Policy

No Trading on "Material Nonpublic Information." If you possess "material nonpublic information" relating to the Company, its subsidiaries or any other entity, you may not (a) purchase or sell securities of the Company or such other entity, (b) direct any other person to purchase or sell such securities or (c) disclose the information to anyone outside the Company.

Material Nonpublic Information. "Material nonpublic information" is information that is not available to the public at large that could affect the market price of a security and which a reasonable investor would regard as important in deciding whether to buy, sell or hold the security. Either positive or negative information may be material. Because trading that receives scrutiny will be evaluated after the fact with the benefit of hindsight, questions concerning the materiality of

particular information should be resolved in favor of materiality, and trading should be avoided. Material information could include, for example:

- forecasts, estimates or projections of earnings or results of operations for current or future periods, particularly information that differs substantially from public expectations;
- a pending or proposed significant merger or acquisition, tender offer, or divestiture or disposition of significant assets;
- significant new products, services or markets;
- developments regarding actual or threatened major litigation or government investigations;
- financings and major events regarding securities, including the declaration of a stock split or the offering of additional securities (debt or equity);
- new major contracts, orders, suppliers, customers or finance sources, or the loss thereof;
- significant cybersecurity risks and incidents;
- a change senior in management;
- a change in auditors or auditor notification that the Company may no longer rely on an audit report;
- changes in debt or equity ratings; or
- financial liquidity problems.

Public Information. Information is considered to be available to the public only when it has been released to the public through appropriate channels (for example, by means of a press release, a publicly accessible conference call or a governmental filing) and enough time has elapsed to permit the investment market to absorb and evaluate the information. As a general rule, information is considered absorbed and evaluated after the completion of the second trading day after the information is released.

Improper Disclosure. The Company has authorized only certain individuals to publicly release material nonpublic information. Unless you are explicitly authorized to do so, you must refrain from discussing material nonpublic information with anyone outside the Company. See the Company's External Communications and Regulation FD Policy. If such information is improperly disclosed to outsiders, the Company may be forced to release it publicly. For example, an improper disclosure which results in a news story about a pending acquisition may require public release of plans that could upset the transaction. Therefore, you should avoid discussing such information in public and should ensure that documents containing sensitive information about the Company are secure and are not distributed improperly.

"Black Out" Periods

A "black out" period is a period during which you may not execute transactions in Company securities. Please bear in mind that even if a black out period is not in effect, at no time may you trade in Company securities if you are aware of material nonpublic information about the Company. For example, if the Company issues a quarterly earnings release and you are aware of other material

nonpublic information not disclosed in the earnings release, you may not trade in Company securities.

Earnings Black Out Periods. These black out periods specifically apply to all directors, Section 16 officers (see the Addendum to Insider Trading Policy), and employees or consultants having access to internal financial statements or other material nonpublic information, including the Chief Executive Officer and his/her regular direct reports and administrative assistants, and the Chief Financial Officer and his/her regular direct reports and administrative assistants. During earnings black out periods, you may not buy or sell Company securities during the period beginning on the next trading day following the fifteenth calendar day of the last month of each fiscal quarter or fiscal year of the Company and ending two market trading days following the public release of the financial results for such fiscal quarter or year (for example, by means of a press release, a publicly accessible conference call or a governmental filing).

Event-Specific Black Out Periods. The Company reserves the right to impose trading black out periods from time to time when, in the judgment of the Company, a black out period is warranted. A black out period may be imposed for any reason, including the Company's involvement in a material transaction, the anticipated issuance of interim earnings guidance or other material public announcements. The existence of an event-specific black out period may not be announced, or may be announced only to those who are aware of the transaction or event giving rise to the black out period. If you are made aware of the existence of an event-specific black out period, you should not disclose the existence of such black out period to any other person.

Hardship Exceptions. If you have an unexpected and urgent need to sell Company securities in order to generate cash you may, in appropriate circumstances, be permitted to sell Company securities during a black out period. Hardship exceptions may be granted only by the Chief Legal and Compliance Officer and must be requested at least two (2) business days in advance of the proposed transaction.

Other Trading Restrictions

The Company considers it improper and inappropriate for you to engage in short-term or speculative transactions in Company securities or in other transactions in Company securities that may lead to inadvertent violations of the U.S. insider trading laws. Accordingly, your transactions in Company securities are subject to the following guidance.

Speculating. You may not undertake speculating in securities of the Company, which may include buying with the intention of quickly reselling such securities, or selling securities of the Company with the intention of quickly buying such securities (other than in connection with the acquisition and sale of shares issued under the Company's stock option plan or any other Company benefit plan or arrangement).

Short Sales. You may not engage in short sales of Company securities (sales of securities that are not then owned), including a "sale against the box" (a sale with delayed delivery).

Publicly Traded Options. You may not engage in transactions in publicly traded options on Company securities (such as puts, calls and other derivative securities) on an exchange or in any other organized market.

Standing Orders. Standing orders should be used only for a very brief period of time. A standing order placed with a broker to sell or purchase stock at a specified price leaves you with no control over the timing of the transaction. A standing order transaction executed by the broker when you are aware of material nonpublic information may result in unlawful insider trading even if the standing order was placed at a time when you did not possess material nonpublic information.

Margin Accounts and Pledges. You may not pledge any Company securities as collateral for a loan and you may not hold Company securities as collateral in a margin account. You may not have control over these transactions as the securities may be sold at certain times without your consent. A margin or foreclosure sale that occurs when you are aware of material nonpublic information may, under some circumstances, result in unlawful insider trading.

Hedging. You may not enter into hedging or monetization transactions or similar arrangements with respect to Company securities.

Transactions Under Company Benefit Plans

The U.S. insider trading laws also restrict your ability to engage in certain transactions under the Company's benefit plans, as described below:

Stock Option Exercises. You may exercise stock options for cash at any time. However, you may not sell the underlying shares of Company stock and you may not engage in a cashless exercise of a stock option through a broker (because this entails selling a portion of the underlying stock to cover the costs of exercise) during any black out period or while you possess material nonpublic information.

Stock Incentive Plan. You may be granted stock-based compensation awards, including restricted shares, under the CPI Card Group Inc. Omnibus Incentive Plan. You may not, however, sell any Company stock granted under the plan during any black out period or while you possess material nonpublic information.

Rule 10b5-1 Plans

Transactions in Company securities under a plan that complies with Rule 10b5-1 under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), are not subject to the prohibition on trades during black out periods or the prohibition on trading while being aware of material nonpublic information described above.

In general, a Rule 10b5-1 plan must be entered into in good faith at a time when the employee is not aware of material nonpublic information and may not be adopted during a black out period. Once the plan is adopted, the employee must not exercise any influence over the amount of securities to be traded, the price at which they are to be traded or the date of the trade. In addition, the plan must either specify (including by formula) the amount, pricing and timing of transactions

in advance or delegate discretion on those matters to an independent third party and restrict any transactions from occurring during a period of at least thirty days following the date the plan is adopted.

Executive officers and directors are encouraged to employ Rule 10b5-1 plans in connection with any sale or disposition of Company securities. The Company requires that all Rule 10b5- 1 plans be approved in writing and in advance by the Company's Chief Legal and Compliance Officer.

Section 16 Reporting

Directors and officers of the Company must file periodic reports regarding their ownership of Company securities pursuant to Section 16(a) of the Exchange Act, and are subject to disgorgement of "short-swing" profits pursuant to Section 16(b) of the Exchange Act. Violations of or failure to comply with these requirements can result in Securities and Exchange Commission enforcement action.

The Company's Board of Directors has adopted an Addendum to this Policy that applies to the Company's directors and officers. Directors and officers must pre-clear all transactions in Company securities with the Company's Chief Legal and Compliance Officer prior to executing such transactions unless such transactions are covered by an approved 10b5-1 plan. The Company will notify you if you are subject to Section 16 of the Exchange Act.

Employee Pre-Clearance List

The Company may require employees whose responsibilities give them regular access to material nonpublic information to pre-clear all transactions in Company securities with the Company's Chief Legal and Compliance Officer prior to executing such transactions. The Company will notify you if you are subject to the pre-clearance list. Unless revoked, a grant of pre-clearance will normally remain valid until the close of trading two business days following the day on which it was granted. If the transaction does not occur during such period, pre-clearance of the transaction must be re-requested.

Canadian Reporting Requirements

In the event that the Company does not qualify as an "SEC foreign issuer" within the meaning of National Instrument 71-102, insiders subject to this policy will have insider reporting obligations under Canadian securities legislation.

The directors, certain officers and certain other employees of the Company and its subsidiaries are "Reporting Insiders" under applicable securities laws. Reporting Insiders are required to file reports with Canadian provincial securities regulators, pursuant to the electronic filing system known as SEDI, of any direct or indirect beneficial ownership of, or control or direction over, securities of the Company and of any change in such ownership, control or direction. In addition, Reporting Insiders must also include in their reports any monetization, non-recourse loan or similar arrangement, trade or transaction that changes the Reporting Insider's economic

exposure to or interest in securities of the Company and which may not necessarily involve a sale, whether or not required under applicable law.

It is the responsibility of each Insider (and not the Company) to comply with these reporting requirements, and Reporting Insiders are required to provide the administrators of the Insider Trading Policy with a copy of any insider report completed by the Insider concurrent with or in advance of its filing. The Company will assist any Insider in the preparation and filing of insider reports upon request.

A person that is uncertain as to whether he or she is a Reporting Insider or whether he or she may be eligible to be exempted from these requirements should contact the Company. Reporting Insiders who are exempted from these requirements remain subject to all of the other provisions of applicable securities law and this Policy.

Post-Termination Transactions

If you are aware of material nonpublic information when your employment or service relationship terminates, you may not trade in Company securities until that information has been publicly released.

Consequences

Insider trading violations are pursued vigorously by the Securities and Exchange Commission and the U.S. Attorneys using sophisticated electronic surveillance techniques, and are punished severely. A person who violates insider trading laws can be sentenced to a substantial jail term and required to pay a criminal penalty of several times the amount of profits gained or losses avoided. Failure to comply with this Policy may also subject you to Company-imposed disciplinary action, including dismissal for cause, whether or not your failure to comply results in a violation of law.

Delegation

The Chief Legal and Compliance Officer may delegate some or all of his or her obligations to an appropriately qualified person by formal, written instruction to the delegate.

Effective: October 4, 2015
Amended: March 2, 2016
March 14, 2018
September 22, 2021
December 7, 2022

CPI CARD GROUP INC. ADDENDUM TO INSIDER TRADING POLICY

Scope of Addendum

This Addendum to the Insider Trading Policy (this "Addendum") applies to the individuals listed on Schedule I attached hereto (collectively, "Insiders"). CPI Card Group Inc. (the "Company") may from time to time designate other individuals who are subject to this Addendum and will amend Schedule I from time to time as necessary to reflect such changes or the resignation or change of status of any individual. The Insiders are required by Section 16(a) of the Securities Exchange Act of 1934, as amended (the "Exchange Act"), to file reports of their holdings of and transactions in Company securities (including employee stock options). Further, Insiders are subject to trading limitations and disgorgement of "short-swing" profits under Section 16(b) of the Exchange Act with respect to transactions in Company securities.

In this Addendum, references to "you" or "Insiders" include:

- your family members who live in your household;
- anyone else who lives in your household;
- any family members who do not live in your household but whose transactions in securities are directed by you or are subject to your influence or control (such as parents or children who consult with you before they trade in securities);
- any person to whom you have disclosed "material nonpublic information"; and
- any person acting on your behalf or on behalf of any individual listed above.

You are responsible for making sure that the purchase or sale of any security covered by this Addendum by any such person complies with this Addendum.

Pre-clearance Procedures

You may not engage in any transaction involving Company securities (including a stock plan transaction such as an option exercise, a gift, loan, pledge or hedge, contribution to a trust or any other transfer) without first obtaining pre-clearance of the transaction from the Chief Legal and Compliance Officer. A request for pre-clearance should be submitted to the Chief Legal and Compliance Officer at least two (2) business days in advance of the proposed transaction. Your request for pre-clearance should include a brief description of the proposed transaction. The Chief Legal and Compliance Officer is under no obligation to approve a transaction submitted for pre-clearance and may determine not to permit the transaction. The Chief Legal and Compliance Officer may not execute a transaction in Company securities unless the Chief Executive Officer has approved the transaction(s) in accordance with the procedures set forth in this Addendum.

This pre-clearance procedure is designed to prevent violations of Section 16(a) and Section 16(b) of the Exchange Act. Section 16(a) of the Exchange Act requires that certain

transactions in Company securities must be reported on Form 4 and filed with the Securities and Exchange Commission (the "SEC") within two (2) business days following the date of the transaction. This Addendum requires not only pre-clearance of transactions in Company securities, but also advance notification of sufficient details of the transaction to give the Company time to prepare and file the required reports within the applicable deadline. To ensure that the Company has sufficient time to prepare and file the Form 4 with the SEC, you must report the details of the transaction to us at least by the close of business on the date the transaction occurred. Due to the short, two-business day period in which to file the reports, the Company may have the Form 4 executed and filed with the SEC on your behalf using the power of attorney that you have granted to the Company for this purpose. Please contact the Company immediately if you believe there may be any errors in a filing.

Section 16(b) provides that Insiders are liable to the Company for any "short-swing profits" resulting from a non-exempt purchase and/or sale of Company securities that occur within a period of less than six (6) months. The SEC may cause the Company to contribute these disgorged profits into a public fund to be used for restitution to the victims of such violations.

Although compliance with Section 16(a), Section 16(b) and other restricted trading periods is your responsibility, the pre-clearance of all trades will allow the Company to assist you in preventing any inadvertent violations.

Exception for Approved Rule 10b5-1 Plans

In accordance with Rule 10b5-1 under the Exchange Act, transactions by Insiders in Company securities that are executed pursuant to an approved Rule 10b5-1 plan are not subject to the prohibition on trading on the basis of material nonpublic information contained in the Insider Trading Policy or to the restrictions set forth above relating to pre-clearance procedures. However, you must timely report such transactions to the Company for reporting on Forms 4 or 5.

In general, a Rule 10b5-1 plan must be entered into in good faith at a time when you are not aware of material nonpublic information and may not be adopted during a black out period. Once the plan is adopted, you must not exercise any influence over the amount of securities to be traded, the price at which they are to be traded or the date of the trade. In addition, the plan must either specify (including by formula) the amount, pricing and timing of transactions in advance or delegate discretion on those matters to an independent third party and restrict any transactions from occurring during a period of at least thirty days following the date the plan is adopted.

The Company requires that all Rule 10b5-1 plans be approved in writing and in advance by the Chief Legal and Compliance Officer and must meet the requirements of Rule 10b5-1.

Effective: March 13, 2018
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December 7, 2022