

CTG Fraud Policy

This corporate fraud policy is established to facilitate the development of controls that will aid in the detection and prevention of fraud against Computer Task Group, Inc. and/or its affiliates (“CTG” or the “Company”) or by its officers, directors, employees, or consultants. CTG intends herewith to promote consistent organizational behavior by providing guidelines and assigning responsibility for the development of controls and the conduct of investigations. This Policy should be read in conjunction with CTG’s Code of Business Conduct.

This Fraud Policy applies to any irregularity or suspected irregularity involving officers, directors, employees, consultants, vendors, and/or other parties with a business relationship with CTG. Even fraud that appears to be to CTG’s benefit will not be tolerated.

Upon credible suspicion of fraud, a thorough investigation will be conducted without regard to the suspected wrongdoer’s length of service, position, title, or relationship to the Company. Any fraud offender may be prosecuted, and CTG personnel will cooperate fully, whether with police, regulators, or other authorities, in any formal investigation. CTG management will make all reasonable efforts to recover wrongfully obtained assets from fraudsters.

Who is responsible for identifying fraud?

Management is responsible for understanding and communicating the fraud risks in their own areas and for detecting suspected fraudulent activity. Although CTG management is ultimately responsible for the detection and prevention of fraud, misappropriations, and other irregularities, ***each CTG employee or consultant is responsible for remaining vigilant against any attempted fraud and for reporting suspected fraud.***

Any irregularity that is detected or suspected to be fraud must be reported immediately to your manager or to the Legal Department. If you wish to remain anonymous, you may make your report through the Whistleblower’s Hotline (ctg.ethicspoint.com or (844) 627-6885).

What is Fraud?

Actions constituting fraud include but are not limited to the following:

- Any dishonest act or an act that involves deception, especially criminal deception;
- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of company activities (see CTG Insider Trading Policy);
- Disclosing confidential and proprietary information to unauthorized parties;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services or materials to the Company, with the exception of gifts of less than \$50 in value;
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment;
- Any similar or related irregularity.

Irregularities concerning an employee’s moral, ethical, or behavioral conduct should be resolved by the department manager or by Human Resources. If you have any question as to whether an action constitutes fraud, ask your manager or the Legal Department.

How do I report a suspected fraud?

Anyone who discovers or suspects fraud will contact only his or her manager, the Legal Department, or the Whistleblower's Hotline immediately. All such communications will be held in strict confidentiality.

The reporting individual will be informed of the following:

- Do not contact the suspected individual in an effort to investigate or demand restitution;
- Do not discuss the case or anything related to it with anyone unless specifically asked to do so by the Legal Department.

What happens once fraud is reported?

The Legal Department has the primary responsibility for the investigation of all suspected fraudulent acts. Suspicions of fraud involving the Legal Department should be directed to Internal Audit or the Audit Committee. Great care must be taken in the investigation of suspected irregularities in order to avoid mistaken accusations or alerting suspected individuals that an investigation is underway.

The Legal Department coordinates all investigations with any affected areas, internal and/or external. If the investigation substantiates that fraudulent activities occurred, the Legal Department will issue reports and a recommendation to appropriate designated personnel and to the Board of Directors through the Audit Committee.

Inquiries, whether internal or external, concerning any investigation will be directed to the Legal Department. No information concerning the status of an investigation will be released, not even the fact of its existence. "No comment" is always the only proper response, even if no investigation exists.

Fraud may result in termination and criminal charges

If an investigation results in a recommendation by the Legal Department to terminate the fraudster, commence a civil lawsuit, and/or turn the matter over to the police and/or regulatory authorities, the recommendation may be reviewed for approval by the Human Resources department, the Audit Committee and, in some cases, by outside counsel before such action is taken, unless there is an urgent threat to persons or property. CTG management will provide timely notice to CTG's insurers and/or bonding company, where appropriate.

The Legal Department does not have the authority to terminate the employee or consultant: the decision to terminate will be made by the employee's or consultant's management team. Should the Legal Department believe that the management team's decision is not appropriate given the facts presented, it may present those facts to the executive officers or to the Audit Committee for a superseding decision.

Investigation results will not be disclosed or discussed with anyone other than those with a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but not proved of fraudulent acts and to protect the Company from potential civil liability.

Retaliation against witnesses will not be tolerated. Any action to cover up a suspected fraud will result in penalties up to and including termination, and may result in criminal or civil charges.