



SLAVERY AND HUMAN TRAFFICKING STATEMENT

The transparency provisions of the United Kingdom Modern Slavery Act 2015 require certain businesses to provide public disclosures regarding efforts to address the issues of slavery and human trafficking in their supply chains and their own businesses. These laws were designed to increase the amount of information made available to the public to allow them to make more informed choices regarding the products they buy and the companies they choose to support.

VeriFone, Inc. and its subsidiaries worldwide (collectively “Verifone” or the “Company”) are committed to conducting business in a lawful and ethical manner. We uphold the values and ethical standards expressed in our Code of Business Conduct and Ethics, which was recently updated to include guiding principles related to human rights, human trafficking and slavery, and environmental protection. In addition, we seek to conform to the Electronic Industry Citizenship Coalition’s Code of Conduct (the “EICC Code of Conduct”), which contains specific requirements covering international labor and human rights standards. These labor and human rights standards are included in our [Supplier Code of Conduct](#). We are committed to conducting business with suppliers who also support our high standards of ethical business conduct and Supplier Code of Conduct.

Verifone’s [Corporate Social Responsibility](#) page includes information on Principles, Plant and People and our expectations related to human rights, including slavery and human trafficking. We will continue to take steps to ensure that slavery and human trafficking are not taking place in our supply chain or our own business operations. To this end, we provide the following information:

- **Verification and Certification:** Verifone evaluates suppliers through a formal review process conducted by our employees. At this time, we do not engage third parties to perform the new supplier verification. During the verification process at on-boarding, suppliers complete a compliance form that includes our Supplier Code of Conduct and certifications related to slavery and human trafficking. The requirement to comply with the laws and standards regarding slavery and human trafficking is also included in our supplier agreements and terms of purchase. We continue to use due diligence screening and automated monitoring for certain suppliers based on a risk ranking system. The monitoring platform is managed by an external service provider and helps us monitor key areas of concern, including human trafficking, human rights, environmental, sanctions and corruption.

Verifone utilizes a combination of procedures and functions to help identify, assess and monitor potential risk areas in our own operations. As part of the hiring process, employees are provided with a written employment agreement/communication in their native language that contains a description of terms and conditions of employment. Verifone requires each new hire to present documentation establishing identity and work eligibility; these documents are visually inspected by a Verifone agent and not retained. Employees may elect to terminate their employment without reprisal. Verifone consults with immigration attorneys on relocations that cross-country borders to aid in managing compliance and minimizing risk when hiring foreign workers.



- **Audits/Assessments:** Our standard supplier agreement provides for the right to inspect, examine and audit the systems, records, data, practices and procedures of our suppliers on an announced or unannounced basis. Verifone may conduct reviews through on-site audits and/or supplier self-assessment questionnaires and certifications and may interview supplier's employees upon request. At this time, any such audits are conducted by Verifone employees. Verifone also maintains a [Compliance Line](#) for reporting potential ethical, legal or regulatory violations in our business or supply chain. Reports are taken seriously and a violation of applicable law or policy may result in corrective action or termination of the supplier business relationship. We continue to evaluate ways to improve our supply chain monitoring and assessment program to confirm compliance in areas of slavery and human trafficking.
- **Internal Accountability:** Verifone's Code of Business Conduct expresses our commitment to ethical business conduct and compliance with applicable laws and governmental rules and regulations. All Verifone employees are required to comply with our Code of Business Conduct and related governance policies, including, for those employees with responsibilities for procurement and supply chain management, informing, educating and enforcement of Verifone's Supplier Code of Conduct. Suspected violations are reportable through various mechanisms, including the [Compliance Line](#). Violations may subject employees to disciplinary actions, including termination of employment.
- **Training:** All employees receive annual training on our Code of Business Conduct and other relevant governance policies. Verifone maintains an internal governance webpage with updated policies and sends communications on relevant compliance topics to all employees. We will continue to provide specific training related to slavery and human trafficking to key employees with direct responsibility for human resources, procurement and supply chain management.

This statement does not confer, nor shall it be deemed to confer, any right on the part of third parties, including any third party beneficiary rights. For example, no employee of any Supplier shall have any rights against Verifone by virtue of this Verification and Certification, nor shall such employees have any rights to cause Verifone to enforce any provision, the decisions with respect to any such action being reserved by Verifone in its sole discretion.

This statement covers the year ending December 31, 2018. It was adopted by the Board of Directors of Verifone, Inc. on February 26, 2019 and will be reviewed and published annually.