



## Supplier Code of Conduct

*Last Updated March 2022*

VeriFone, Inc. and its subsidiaries worldwide (“Verifone,” “Company,” “we” or “our”) are committed to responsible sourcing and compliance impacting its supply chain. Verifone expects its service providers, vendors and suppliers (“Suppliers”) to comply with all applicable laws and to adopt appropriate practices in accordance with the principles set forth in this Supplier Code of Conduct (“Supplier Code”). This Supplier Code is based on the framework of Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition “EICC”) Code of Conduct that defines the standards to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that business operations are conducted ethically and in environmentally sustainable manner.

**Business Ethics:** Verifone has a solid reputation for honesty, integrity, and ethical dealings and we are proud of this reputation. We expect our Suppliers to comply with all applicable laws and regulations and to uphold the highest standards of ethical conduct.

- **Business Integrity:** Supplier shall uphold the highest standards of integrity in business interactions with Verifone and maintain accurate books and records regarding all transactions with and on behalf of Verifone or with regard to its products and services. Monitoring procedures should be implemented to identify and prevent criminal activity in business transactions, including extortion, embezzlement, money laundering, and fraud.
- **Anti-Corruption and Anti-Bribery:** Suppliers shall comply with all applicable anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and other applicable anti-corruption laws and international conventions. Bribes or other means of obtaining an undue, illegal, or improper advantage may not be offered, promised, authorized, accepted, or given in the context of any Verifone transactions.
- **Conflict of Interests:** Supplier shall not enter into a financial or any other relationship with a Verifone employee that creates or gives the appearance of a conflict of interest. Even the appearance of a conflict of interest can be damaging to Verifone and to the Supplier. Any real or potential conflict of interest must be disclosed, when known, to the Company for review.
- **Improper Advantage:** Supplier shall not offer a gift, benefit or anything of value that might appear to improperly influence or compromise the judgment of Verifone or a Verifone employee. Any gift or benefit must comply with all applicable laws and regulations, the Supplier’s policies and Verifone’s Code of Conduct.
- **Responsible Sourcing:** Suppliers shall exercise due diligence to comply with applicable laws and regulations related to sourcing of materials. This includes, but is not limited to, regulations related to conflict minerals (e.g., tantalum, tin), toxic materials, and protected or endangered fish, plants, or wildlife. Suppliers shall exercise due diligence on the source and chain of custody of materials and resources, as applicable, and make their due diligence measures available to Verifone upon request. Supplier shall also assure that all materials incorporated into Verifone's product comply with applicable laws regarding eradication of forced labor, human trafficking, and slavery.



- Non-Retaliation: Supplier shall maintain procedures to ensure the protection of whistleblowers, in accordance with local laws and regulations, and to prohibit retaliation against individuals who make a report in good faith.
- Accurate Records: Business dealings should be performed transparently and accurately reflected on Supplier's business books and records. Information regarding labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.
- Protection of Intellectual Property and Confidential Information: Supplier shall respect intellectual property rights and safeguard Verifone's data and information. Supplier shall protect intellectual property and confidential business information to prevent unauthorized disclosure.
- Data Protection and Privacy: Supplier shall protect personal information and comply with applicable data protection laws and regulations when personal information is collected, stored, processed, transmitted, or shared.
- Fair Business, Advertising, and Competition: Supplier shall uphold standards of fair business, advertising and competition and comply with applicable laws and regulations.

**Labor and Human Rights:** Verifone is committed to upholding fair labor practices and respecting the human rights of workers. We expect our Suppliers to share in this commitment and to adopt sound human rights practices and to treat workers fairly with dignity and respect.

- Wages and Benefits: Supplier shall comply with applicable wage laws and regulations, including those relating to minimum wages, overtime hours and legally mandated benefits. Deductions from wages should not be improperly used as a disciplinary measure and workers should not be required to pay fees to secure or maintain employment. Supplier shall only hire workers authorized to work in accordance with applicable laws and regulations.
- Working Hours: Supplier shall comply with applicable laws and regulations with respect to working hours, rest and meal breaks and days of rest and workers should be allowed at least one day off per seven-day week. Except in emergency or unusual situations, a workweek should be restricted to 60 hours, including overtime.
- Non-Discrimination: Supplier shall commit to a workplace free of unlawful discrimination and should not discriminate against any worker on any unlawful basis.
- Young Workers: Supplier shall not use child labor as defined by local law or 15 years of age whichever is greatest, or older age if required for certain types of work. This does not prohibit legitimate workplace apprenticeship programs which comply with applicable laws and regulations. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety.
- Humane Treatment and Anti-Harassment: Supplier shall commit to a workplace free of harassment and abuse. Supplier shall not subject workers to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.



- **Freely Chosen Employment:** Supplier shall not use forced, bonded, indentured, or involuntary prison labor and will not engage in slavery or trafficking of persons. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force coercion, abduction or fraud. All work must be voluntary and workers should be free to leave work or terminate their employment with reasonable notice. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to no unreasonable restrictions on entering or exiting company-provided facilities. Workers must not be required to surrender any government-issued identification, passports, or work permits as a condition of employment.
- **Freedom of Association:** As permitted by applicable laws and regulations, the rights of workers to associate freely, form and join workers organizations, seek representation, and bargain collectively should be respected. Workers should be permitted to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

**Health & Safety:** In addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services. Verifone expects our Suppliers to comply with applicable occupational health and safety requirements.

- **Occupational Safety:** Supplier shall identify, evaluate and manage potential safety and health hazards (e.g., electrical and other energy sources, fire, vehicles, and fall hazards) through safe work procedures, preventative maintenance, protective measures and training. Supplier shall provide workers with appropriate personal protective equipment in situations where hazards cannot be adequately controlled.
- **Emergency Preparedness:** Supplier shall identify, evaluate and manage potential emergency situations and implement appropriate emergency plans and response procedures, such as emergency reporting, evacuation procedures, fire detection and suppression, training, and recovery. Such plans and procedures should focus on minimizing harm to life, the environment and property.
- **Occupational Injury and Illness:** Supplier shall establish procedures to prevent, manage, track and mitigate occupational injury and illness, including provisions to encourage reporting, provide necessary medical treatment and investigate cases and implement corrective actions.
- **Industrial Hygiene:** Supplier shall identify, evaluate and manage worker exposure to hazardous, chemical, biological and physical agents. Controls should be in place to prevent overexposure, including to excessive noise levels and, when necessary, workers should be provided with the appropriate personal protective equipment.
- **Machine Safeguarding:** Supplier shall evaluate production and other machinery for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.
- **Physically Demanding Work:** Supplier shall identify, evaluate and manage worker exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks.



- Sanitation, Food and Housing: Supplier shall provide workers with reasonable access to clean toilet facilities and potable water. Supplier provided food preparation, storage and eating areas shall be sanitary. Dormitories or housing provided to workers by Supplier shall be clean and safe with adequate emergency egress, heat and ventilation, and reasonable personal space along with entry/exit access. Excessive fees for food or lodging shall not be charged to workers.
- Health and Safety Communication: Supplier shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards.

**Environment:** Verifone recognizes that environmental responsibility is integral to producing world class products. We expect Suppliers to comply with applicable environmental laws and regulations to minimize adverse effects on the community, environment and national resources.

- Environmental Permits and Reporting: Supplier shall obtain, maintain and keep all environmental permits (e.g., discharge monitoring) and registrations, as required by applicable law or regulation, and follow operational and reporting requirements of such permits.
- Hazardous Substances: Supplier shall identify and manage substances that pose a hazard if released into the environment to ensure safe handling, movement, storage, recycling, reuse, and disposal. Suppliers shall comply with applicable labeling laws and regulations for recycling and disposal.
- Solid Waste Emissions: Supplier shall monitor, control, and treat solid waste generated from operations, industrial processes, and sanitation facilities before discharge or disposal.
- Water Management: Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal.
- Air Emissions: Supplier shall identify, manage, monitor, and responsibly control air emissions that pose an environmental risk or hazard (e.g., corrosives, ozone depleting chemicals).
- Pollution Prevention and Resource Reduction: Supplier shall take steps to reduce or eliminate waste by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.
- Material Restrictions: Supplier shall adhere to applicable laws and regulations and Verifone requirements regarding prohibition or restriction of specific substances including labeling for recycling and disposal.
- Energy Consumption and Greenhouse Gas Emissions: Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions are to be tracked and documented, at the facility and/or corporate level. Participants are to look for cost effective methods to improve energy efficiency and to minimize their energy consumption and greenhouse gas emissions.



**Management System:** Supplier shall implement and maintain a management system that facilitates continual compliance improvement and is designed to ensure: 1) compliance with applicable laws, regulations and Verifone requirements related to Supplier; 2) conformance with the applicable standards set forth in this Supplier Code; and 3) identification and mitigation of operational risks related to this Supplier Code. The management system should include appropriate measures, such as internal audits, risk assessments, management accountability and commitment, worker training, corrective action and recordkeeping.

**Questions & Reporting:** For more information on Verifone’s Supplier expectations or the standards addressed in this Code, please speak with your Verifone representative or you can address your inquiries to: **VeriFone, Inc., 2744 N University Drive, Coral Springs, FL 33065, USA.**

This Supplier Code of Conduct 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 any Verification or 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.