



VeriFone, Inc.'s Annual Report Fighting Against Forced Labour and Child Labour in Supply Chains Act

VeriFone, Inc., and its subsidiaries worldwide (collectively “**Verifone**,” the “**Company**,” or “**we**”) are committed to conducting business in a lawful and ethical manner. We uphold the values and ethical standards expressed in our Code of Business Ethics & Conduct, which include guiding principles related to human rights, human trafficking and slavery, and environmental protection. In addition, we seek to conform to the Responsible Business Alliance’s Code of Conduct, which contains specific requirements covering international labor and human rights standards. These labour 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 adopt appropriate practices in accordance with the principles set forth in our Supplier Code of Conduct.

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “**Act**”), this report is a joint report outlining VeriFone, Inc., and VeriFone Canada Inc. (the “**Reporting Entities**”) efforts to reduce the risk that forced labour and child labour is used at any step of the production of goods in Canada or elsewhere by Verifone or of goods imported into Canada by Verifone or third parties supplying Verifone. This report covers the period from January 1, 2023, to December 31, 2023 (the “**Reporting Period**”).

Multiple Jurisdictions:

Verifone is also subject to reporting requirements under the following legislations:

- The United Kingdom’s Modern Slavery Act 2015;
- Australia’s Modern Slavery Act 2018;
- Norway’s Transparency Act (Åpenhetsloven) 2022

Verifone’s [Corporate Social Responsibility](#) page includes information on Principles, Planet, 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. Currently, we do not engage third parties to perform new supplier verification. During the verification process at onboarding, 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. 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 trade export and sanctions.

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 offer that contains a description of the terms and conditions of employment. Verifone requires each new hire to present documentation establishing identity and



work eligibility; these documents are securely retained until completion of the onboarding process. 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 suppliers' 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 Ethics & Conduct expresses our commitment to ethical business conduct and compliance with applicable laws and governmental rules and regulations. All Verifone officers, directors, employees, and others working on our behalf are required to comply with our Code of Business Ethics & Conduct and related governance policies, including employees with responsibilities for procurement and supply chain management. Suspected violations are reportable through various mechanisms, including the Compliance Line. Violations may subject employees to disciplinary actions, including termination of employment. Where Verifone has suffered a loss, it may pursue other remedies against the individuals or entities responsible, including via civil and/or criminal proceedings.
- **Training:** All employees receive training on our Code of Business Ethics & Conduct and other relevant governance policies. Verifone also 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.

Approval and Attestation

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act for the reporting year listed above.

I have the authority to bind VeriFone, Inc., and VeriFone Canada Inc.

Karen P. Anderson

General Counsel,
VP and Secretary

May 30, 2024

DocuSigned by:
Karen P. Anderson
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Signature