



## Verifone Norway AS Annual Report Duty to Account for Due Diligence Norway's Transparency Act (Åpenhetsloven)

### Introduction

VeriFone, Inc., and its subsidiaries worldwide (including Verifone Norway AS, and collectively “**Verifone**,” the “**Company**,” or “**we**”) is committed to conducting business in a lawful and ethical manner. As part of a global leader in financial technology and payments solutions, Verifone adheres to the highest standards of human rights, labor practices, and environmental protection.

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 labor and human rights standards are included in Verifone's [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.

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:

### Due Diligence Process

**Mapping and Assessment:** Verifone conducts regular due diligence assessments proportionate to the size and nature of our business and the severity and likelihood of potential negative impacts. This includes:

- Mapping and assessing actual and potential negative impacts on human rights and decent working conditions caused or linked to our operations, products, services, or supply chains. For example, our suppliers are required to sign an NDA, read and sign our Supplier Code of Conduct, and provide Banking Details and Tax ID Documentation.
- Engaging with stakeholders to understand their concerns and integrating these insights into our risk assessment and mitigation strategies.

**Implementation of Measures:** Measures taken to cease or mitigate identified risks and impacts include:

- Signing NDAs, Supplier Code of Conduct, and providing Banking Details and Tax ID Documentation.
- Monitoring the effectiveness of these measures through both announced and unannounced audits, self-assessment questionnaires, and regular reviews of suppliers' practices.

**Monitoring and Communication:** We continuously monitor the implementation and results of these measures and communicate with affected stakeholders about how negative consequences have been handled.





**Recovery and Compensation:** We provide or cooperate on remediation and compensation where necessary.

### **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 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. Currently, 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's 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.

### **Reporting Requirements**

Verifone's due diligence report will be published by June 30 each year and will be easily accessible on the company's website. This report will be updated in case of significant changes in risk assessments. The report will include:

- A general description of the company's structure, operations, and procedures for handling adverse impacts.
- Information on identified adverse impacts and significant risks.
- Measures taken to address these impacts and their results or expected results.

### **Right to Information**

Upon written request, Verifone will respond to public requests for information regarding how we address actual and potential adverse impacts on human rights and working conditions within three weeks of receiving the request. This information will be clear and comprehensive to foster public accountability.



### 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.

### Exemptions and Sensitive Information

There are exclusions for information regarding individual personal circumstances and proprietary or competitively sensitive information. Ensure that exclusions are compliant with the Act.

### Conclusion

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 of 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.

Date: 12/15/2025

Signed by:

A handwritten signature in blue ink that reads "Anish Mehta".

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Anish Mehta

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A handwritten signature in blue ink that reads "Martin Gutekunst".

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Martin Gutekunst