

Verifone

California Transparency in Supply Chains Act Disclosure (SB-657)

Verifone, Inc. and its affiliated entities (collectively “Verifone” or “our”) are committed to conducting business ethically and with integrity, and to respecting human rights in our global operations and supply chain. Verifone supports the elimination of human trafficking, forced labor, slavery, child labor, and other forms of exploitation.

This disclosure is made pursuant to the California Transparency in Supply Chains Act of 2010 describes the steps Verifone takes to identify and address the risks of human trafficking and slavery in our supply chain.

Verifone designs, develops, and distributes payment devices, point-of-sale systems, and payment software solutions. Our products are manufactured through a global network of suppliers, contract manufacturers, and component providers.

1. Verification of Product Supply Chains

Verifone maintains a risk-based supplier due diligence process designed to evaluate and address potential risks of human trafficking and forced labor in its supply chain.

Verifone:

- Conducts supplier onboarding due diligence, including screening of prospective suppliers against sanctions and restricted-party lists
- Evaluates suppliers based on geographic, industry, and operational risk factors
- Identifies higher-risk suppliers using risk indicators such as manufacturing location, labor intensity, and subcontracting practices
- Requires suppliers to comply with the Verifone Supplier Code of Conduct, which prohibits forced labor, bonded labor, prison labor (except as legally permitted), and human trafficking

Verifone also utilizes third-party risk assessment tools to help identify potential risks in its supply chain.

2. Audits of Suppliers

Verifone reserves the right to audit suppliers for compliance with applicable laws (including laws relating to human rights, human trafficking and anti-slavery).

Verifone:

- May conduct audits of higher-risk suppliers, either directly or through qualified third-party auditors
- Requires suppliers to cooperate with audits and provide documentation concerning labor practices
- Requires suppliers to implement corrective action plans where deficiencies are identified

Failure to remediate identified issues may result in suspension or termination of the supplier relationship.

3. Supplier Certification Requirements

Verifone requires suppliers, as part of their contractual obligations, to certify that:

- Materials incorporated into Verifone products are produced in compliance with applicable labor and anti-human trafficking laws
- They do not use forced, bonded, or involuntary labor
- They do not engage in human trafficking or exploitative labor practices
- They impose equivalent requirements on their own subcontractors and suppliers

These requirements are incorporated into supplier agreements and the Verifone Supplier Code of Conduct.

4. Internal Accountability Standards

Verifone maintains internal policies and procedures designed to promote ethical conduct and accountability, including:

- A Code of Conduct applicable to all employees
- An Anti-Bribery and Anti-Corruption Policy applicable to all employees
- A Supplier Code of Conduct addressing labor and human rights practices
- A confidential reporting mechanism that allows employees and third parties to report suspected misconduct, including labor or human rights concerns

Employees and suppliers who violate Company policies or contractual requirements may be subject to disciplinary action, up to and including termination of employment or contract.

5. Training

Verifone provides training to employees who have direct responsibility for supply chain management, sourcing, procurement, and supplier oversight. Training includes:

- Ethical sourcing principles
- Identification of forced labor and human trafficking risks
- Supplier due diligence and escalation procedures
- Reporting obligations and use of Verifone's reporting channels

Training is provided periodically and as part of onboarding for relevant roles.