



## Supplier Code of Conduct

Verifone Systems, Inc. and its subsidiaries worldwide (“Verifone” or the “Company”) are committed to responsible sourcing and compliance impacting its supply chain. Verifone further expects its suppliers (“Suppliers”) to adopt sound practices in accordance with the principles set forth in this Supplier Code of Conduct (“Supplier Code”) and in compliance with all applicable laws and regulations. This Supplier Code is based on the framework of the Electronic Industry Citizenship Coalition’s (“EICC”) Code of Conduct that establishes standards to ensure that working conditions in the supply chain are safe, that workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

**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 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, 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, given or accepted to or by a government official or 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 and must be disclosed, when known, and approved by the Company.
- **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 and Employee Standards.
- **Responsible Sourcing of Materials:** Suppliers shall exercise due diligence to reasonably assure that the tantalum, tin, tungsten and gold in the products, parts, components, and materials they manufacture does not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to Verifone upon request. Supplier shall also assure that products provided to Verifone do not contain protected or endangered fish, plant or wildlife. Supplier shall also assure that all materials incorporated into Verifone's product comply with the laws regarding eradication of human trafficking and slavery of the country or countries in which the supplier does business.



- Non-Retaliation: Supplier shall maintain procedures to ensure the protection of whistleblowers, in accordance with local laws and regulations, and to prohibit retaliation against workers who make a report in good faith.
- Protection of Intellectual Property and Confidential Information: Supplier shall respect intellectual property rights and safeguard customer 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 laws and regulations when personal information is collected, stored, processed, transmitted, or shared.

**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, to treat workers fairly and 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 used as a disciplinary measure and workers should not be required to pay fees to secure 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.
- Anti-Discrimination: Supplier shall commit to a workplace free of harassment and unlawful discrimination and should not discriminate against any worker on any unlawful basis.
- Child Labor: 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.
- Involuntary Labor and Human Trafficking: 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.
- **Incident Management:** Supplier shall establish procedures to prevent, manage, track and mitigate occupational injury and illness.
- **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 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.

**Environment:** Verifone is committed to environmental responsibility and protection. 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.
- Wastewater and Solid Waste Emissions: Supplier shall monitor, control, and treat wastewater and solid waste generated from operations, industrial processes, and sanitation facilities before 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.
- Product Content 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.

**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.  
88 West Plumeria Drive  
San Jose, CA 95134  
Attn: Chief Procurement Officer**

Verifone also maintains a [Compliance Line](http://www.verifone.com) that is available to you on our webpage ([www.verifone.com](http://www.verifone.com)).

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 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.