



Verifone Norway AS Annual Report

Duty to Account for Due Diligence

Norway's Transparency Act (Åpenhetsloven)

Verifone Norway AS is a wholly owned subsidiary of VeriFone, Inc. VeriFone, Inc., and its subsidiaries worldwide (collectively “**Verifone**,” the “**Company**,” or “**we**”) are a global Financial Technology leader and payments solutions provider. Verifone provides valuable end-to-end payment and commerce solutions to the world’s best-known retail brands, major financial institutions, and directly to more than 600,000 merchants alike. The company’s global services platform is built on a four-decade history of innovation and uncompromised security and handles 10.4B+ online and in-store transactions annually, totaling more than \$440B. Trusted and recognized by consumers for its growing footprint of 35 million devices in more than 150 countries, businesses choose Verifone for its global scale, local capabilities, omnichannel prowess and solution flexibility.

Verifone 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.

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.

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 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.

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Martin Gutekunst, Head of Nordics

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Anish Mehta, Chief Financial Officer

Date 30 June 2024