



STATEMENT ON MODERN SLAVERY AND HUMAN TRAFFICKING

At Lightspeed, our mission is to bring cities and communities to life by powering independent business. Honest and ethical conduct is critical to achieving this goal. In line with this objective, we have issued this statement intended to fulfil the legal requirements of various regions concerning the prevention of modern forms of slavery and human trafficking. When we refer to “**Lightspeed**”, “**we**”, “**us**” or “**our**”, we mean Lightspeed POS Inc. and its affiliated entities worldwide¹. This statement covers the financial year ending on March 31, 2020.

OUR BUSINESS

Lightspeed is a global provider of cloud-based commerce platforms for the retail and hospitality sectors, including innovative eCommerce, loyalty and payment processing solutions. We believe that cities and communities are built on the vibrancy, presence, and success of small and medium-sized businesses. We set out to help entrepreneurs work smarter, make data-driven decisions, and create the best possible experiences for their customers. Upholding the highest standards of ethical conduct, honesty accountability is essential to the fulfillment our mission. That philosophy still runs through everything that we do.

We are committed to making responsible business decisions which take into consideration the prevention of modern slavery and human trafficking. In order to achieve this objective, we maintain open communication channels with management of our affiliates worldwide and prioritize direct consultation on matters related to modern slavery prevention. As a result, we can confirm that no member of our family of companies is involved in child labour, forced labour, debt bondage, or any other form of modern slavery and human trafficking. We do not build relationships with businesses that we know engage or take part in such activities.

Current Policies

We have implemented a Code of Business Conduct and Ethics which is accessible to each of our employees at all times. The Code of Business Conduct and Ethics outlines our most fundamental shared values and helps our employees understand and comply with company policies, applicable laws, and rules and regulations. The Code of Business Conduct and Ethics instructs employees to act with integrity and in compliance with applicable laws in all facets of their job and to promptly report their concerns of any illegal or unethical activity. Each of our policies, including the Code of

¹ Including, without limitation, Lightspeed POS USA Inc., Lightspeed Payments USA Inc., Lightspeed POS UK Ltd., and Kounta Pty Ltd.

Business Conduct and Ethics, is routinely reviewed and updated by appropriate Lightspeed stakeholders to ensure relevance and compliance with applicable legal standards.

Due Diligence and Analysis of Supply Chain

The prevention of modern slavery and human trafficking is an important consideration for any business. As such, we have conducted appropriate due diligence as part of our wider commitment around corporate social responsibility, equitable trade, and human rights.

Taking into account the nature of our business activities, we have determined that our supply chain is low risk with respect to instances of modern slavery and human trafficking. Lightspeed's supply chain is composed mainly of North American, European and Australian businesses who hire qualified personnel and abide by applicable labour standards. As such, we do not generally conduct audits of our suppliers. When we occasionally choose to partner with businesses operating in countries or industries we consider to be high risk, we implement appropriate diligence measures to assess actual risk of human rights violations, such as obtaining reports from Lightspeed employees who work closely with such suppliers.

OUR INITIATIVES

We understand the impact and prevalence of modern slavery in the global supply chain. With a view of doing our part to address these issues, we have implemented the measures described below into our business processes. On an annual basis, we review the effectiveness of these measures through active discussion and consultation with stakeholders and management. We will continue to scrutinize our supply chain in order to better detect the risks of modern slavery, adequately assess their importance, and identify the appropriate response.

Employees Engaging with Third Parties

Although formal training on these matters is not generally offered, employees who manage relationships with third parties, such as suppliers, agents, consultants, and independent contractors, are expected to ensure that those parties are made aware of the relevant provisions of the Code of Business Conduct. In doing so, our direct suppliers are informed of what is required from them when doing business with us, without having them formally certify their compliance with applicable anti-slavery laws.

Evaluation of High-Risk Suppliers

As part of our initiatives to combat modern slavery, we have identified the suppliers which we consider to be higher risk based on various factors such as geographic location and manufacturing

processes, the history of human trafficking and slavery in the sector, and the U.S. Department of Labor’s list of goods commonly produced by child labour or forced labour. Such suppliers were sent letters requesting confirmation that they have evaluated their business with respect to modern slavery and human trafficking prevention and have adopted appropriate measures to correct any issues.

Contractual Warranties

In addition and on a going-forward basis, we will ensure that contractual arrangements with high-risk suppliers contain warranties that such suppliers do not engage in any form of modern slavery or human trafficking. We will not tolerate any high-risk supplier who is unable or unwilling to show its commitment to combat modern slavery.

Lightspeed takes its role in ending modern slavery very seriously. We believe that slavery, servitude, compulsory labour, human trafficking, and any similar or related practice have no place in our global society. Accordingly, this statement and our associated initiatives will be scrutinized and re-evaluated on a regular basis, so as to ensure a transparent, ethical, and efficient supply chain.



Dax Dasilva
Chief Executive Officer

This Statement on Modern Slavery and Human Trafficking was approved by the board of directors of Lightspeed POS Inc. on April 11, 2020.