



# Supplier Code of Conduct

The communities of which we are a part are vibrant and diverse. They include our colleagues, customers, prospects, partners and suppliers, shareholders, the broader communities in which we live and work, Lightspeed the company itself, and even our competitors. Our suppliers are an integral part of this ecosystem and are critical partners in our success. We believe in working with those suppliers who support our core values and operate with integrity, honesty, and accountability. This Supplier Code of Conduct ("**Code**") is a statement that highlights our expectations for our suppliers with respect to business ethics, human rights, labor practices, health and safety, and environmental management. It applies to all suppliers of products or services who do business with or on behalf of Lightspeed ("**Suppliers**").

When we refer to "Lightspeed" or "we" or "our", we mean Lightspeed Commerce Inc. and its affiliated entities worldwide.

## 1. Compliance with Laws and Regulations

It goes without saying that our Suppliers must comply with all the applicable laws, rules, and regulations of the jurisdictions in which they operate. This includes, but is not limited to, laws and regulations relating to child labor, anti-modern slavery and human trafficking, health and safety, human rights and labor practices, privacy and information security, anti-bribery/anti-corruption, trade compliance/export controls, and the environment.

## 2. Human Rights and Labor Practices

We believe that every member of our community should be treated the way they want to be treated. This means that our Suppliers should adopt sound labor practices, respect human rights, and create a work environment in which their workers feel valued and respected. Our Suppliers should:

- prohibit child labor, modern slavery, and human trafficking in production or anywhere in their business and supply chain
- respect employees' right to leave one's employment upon reasonable notice
- allow workers to associate freely and bargain collectively in accordance with applicable laws and regulations
- provide fair wages and benefits to their workers that meet or exceed local regulations
- ensure that working hours do not exceed applicable legal limits
- treat workers and third parties with dignity and respect and not permit any kind of physical, sexual, verbal, or psychological violence, bullying, discrimination, harassment, or abuse



- ensure fair hiring, retention, and evaluation processes

### **3. Diversity, Equity, and Inclusion**

The values of Diversity, Equity, and Inclusion are embedded in everything we do at Lightspeed especially when it comes to decision making. As such, we expect our Suppliers to actively promote these values and ensure an inclusive workplace with a zero-tolerance policy on physical, sexual, verbal, or psychological violence, bullying, discrimination, harassment, abuse, or any kind of inappropriate behavior.

Suppliers must treat all employees and third parties with whom they do business with dignity and respect and comply with legal obligations that prohibit discrimination or harassment based on race, national or ethnic origin, color, religion, age, sex, sexual orientation, gender identity, or expression, marital status, family status, genetic characteristics, disability, and other protected categories.

### **4. Business Ethics**

At Lightspeed, we are committed to fair business practices and expect our Suppliers to conduct all business dealings appropriately and accurately. Manipulation or falsification of conditions, practices, or records is unacceptable. Our Suppliers must comply with all applicable anti-bribery and anti-corruption laws. These include, but are not limited to, the UK Bribery Act and the U.S. Foreign Corrupt Practices Act ("**FCPA**"). Suppliers should not directly, or indirectly, engage in corruption, bribery, money laundering or fraudulent or deceptive conduct, kickbacks, facilitation payments, antitrust/ unfair competition, or any business practices that are in breach of applicable laws, or that would put Lightspeed at risk of breaching applicable laws.

Suppliers shall not offer or provide gifts to Lightspeed employees that are excessive or unreasonable under the circumstances or could be used to gain an unfair advantage or inappropriately influence Lightspeed's business decisions. Suppliers should refer to the [Code of Conduct and Ethics](#) on our investor relations website for the full guidelines regarding gifts and entertainment and conflict of interest when dealing with our employees.

### **5. Privacy**

We are committed to maintaining the accuracy, confidentiality, security, and privacy of the personal information of our customers and expect Suppliers to act the same way. Our Suppliers must protect the confidentiality of employees' and customers' personal and commercial information in compliance with applicable privacy and information security laws and regulations, irrespective of whether the information and data were provided by the employee, customer, or



created by the Supplier. All information that is not available in the public domain should be considered confidential. We expect our Suppliers to handle the information in accordance with the contract between us.

## **6. Intellectual Property**

At Lightspeed, trademarks, copyrights, inventions, patents, domain names, industrial designs, trade secrets, and "know-how" are among our most important assets. Suppliers must respect our intellectual property rights, including copyrighted information, trademarks and logos, patents, and trade secrets against loss or infringement. The transfer of technology and know-how is to be conducted in a manner that protects intellectual property rights.

## **7. Occupational Health and Safety**

We expect our Suppliers to comply with all applicable health and safety laws and regulations and provide a healthy and safe working environment for their workers. Suppliers should take proactive measures to prevent workplace hazards and never tolerate any threats or acts of violence that may instill fear in others.

## **8. Environment**

We strive to make responsible, sustainable choices when it comes to protecting the environment and urge our Suppliers to do so too. We encourage them to manage their environmental risks and reduce impacts on the environment, including climate change. It goes without saying that Suppliers must comply with all applicable environmental laws, regulations, and standards. This includes, but is not limited to, waste management, recycling and disposal, wastewater management, environmental permits, air emissions controls, and environmental reporting.

## **9. Responsible Sourcing of Minerals**

We promote responsible sourcing of materials and expect our Suppliers to have the policy to assure that the minerals used in their products are conflict-free and do not directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Suppliers must comply with all the applicable requirements related to conflict minerals and exercise proper due diligence, and provide evidence of such diligence measures to Lightspeed upon request.

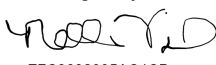


## 10. Reporting and Retaliation

We all have a responsibility to conduct business in a fair and ethical manner. If you believe that any employee of the Supplier or Lightspeed is in non-compliance with this Code, you should immediately report your concerns to:

[www.lightspeedhq.ethicspoint.com](http://www.lightspeedhq.ethicspoint.com)

Ethics Hotline: (844) 473-9910

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For Counterparty

4/3/2024