



STATEMENT ON ANTI-MODERN SLAVERY AND HUMAN TRAFFICKING

INTRODUCTION

This statement on Modern Slavery and Human Trafficking (the “**Statement**”) describes the actions taken by Lightspeed Commerce Inc. (“**we**”, “**our**”, “**Lightspeed**” or the “**Company**”) and, as defined below in the section “Our Structure”, its Reporting Subsidiaries (together with Lightspeed, the “**Lightspeed Group**”) during the fiscal year ended March 31, 2023 (“**FY23**”) to prevent modern slavery and human trafficking in our operations and our supply chains pursuant to the *Modern Slavery Act 2015* (United Kingdom) and the *Modern Slavery Act 2018 (Cth)* (Australia).

Lightspeed, as the principal governing body of the Lightspeed Group, is submitting this joint Statement on behalf of its Reporting Subsidiaries. This Statement has been prepared by Lightspeed in consultation with the senior management of the Reporting Subsidiaries. The Lightspeed Board of Directors approved this Statement at its meeting held on May 17, 2023.



WHO WE ARE, OUR STRUCTURE, BUSINESS OPERATIONS AND SUPPLY CHAINS

About Lightspeed

Founded in Montréal, Canada, in 2005, Lightspeed is dual-listed on the New York Stock Exchange and Toronto Stock Exchange (NYSE: LSPD) (TSX: LSPD). Lightspeed offers a cloud-based commerce platform that connects suppliers, merchants and consumers while enabling omnichannel experiences for small and medium-sized businesses around the world. With the mission to ignite business everywhere and with teams across North America, Europe and Asia-Pacific, the Company serves retail, hospitality and golf businesses in over 100 countries. More information about our business and operating entities can be found in our latest [Annual Report](#).

Our Structure

Lightspeed is a corporation incorporated under the laws of Canada and the principal governing body of the Reporting Subsidiaries, which include the following entities:

In the United Kingdom and Northern Ireland:

- **Lightspeed POS UK Ltd.**, a private limited company incorporated in England and Wales and a wholly owned subsidiary of Lightspeed.
- **ShopKeep.com LTD**, a private company limited by shares incorporated in Northern Ireland and a wholly owned subsidiary of Lightspeed.

In Australia:

- **NuORDER Pty Ltd**, a proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Lightspeed.
- **Lightspeed POS Holding Pty Ltd**, a proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Lightspeed.
- **Lightspeed POS Australia Pty Ltd**, a proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Lightspeed POS Holding Pty Ltd.
- **Vend Pty Limited**, a proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Lightspeed POS Holding Pty Ltd.
- **Kounta Holdings Pty Ltd**, a proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Lightspeed POS Australia Pty Ltd.
- **Kounta IP Pty Ltd**, a proprietary company limited by shares incorporated in Australia and a



wholly owned subsidiary of Kounta Holdings Pty Ltd.

- **Kounta Pty Ltd.**, a proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Kounta Holdings Pty Ltd.

Lightspeed also has wholly owned subsidiaries outside the United Kingdom and Australia in North America, Europe and Asia-Pacific.

Our Supply Chain

We are committed to making responsible business decisions which take into consideration the prevention of modern slavery and human trafficking in our operations and supply chain. Lightspeed's supply chains mainly consist of:

- Hardware and software, including tablets, customer-facing display, receipt printers, networking hardware, cash drawers, servers, stands, barcode scanners, payment terminals and an assortment of accessories, software subscriptions, and cloud-based software and related components (i.e. semiconductor chips);
- Data storage services;
- Sponsorships, marketing events and trade show services; and
- Professional services from our advisors including background check services, law firms, consulting, staffing, financial advisory, accounting and other professional services firms.

The majority of our suppliers and vendors are based in North America (mostly the United States) where the labor environment is well-regulated. A small minority of sub-components hardware suppliers are operating in regions with a history of less robust regulation. As a software-as-a-service business, with the majority of our suppliers being software and professional services providers, Lightspeed operates in a sector that is considered relatively low risk for modern slavery and human trafficking.

LIGHTSPEED'S RISKS OF MODERN SLAVERY PRACTICES IN ITS OPERATIONS AND SUPPLY CHAINS

Taking into account the nature of our business activities and our industry, 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 businesses in North America, Europe, Australia and New Zealand who hire qualified personnel and abide by applicable labor standards. As such, we do not generally conduct formal audits of our suppliers, beyond verifying compliance with applicable laws and jurisdictions, having our suppliers review and sign our Supplier Code of Conduct, and conducting our standard security, privacy and technology assessments. When we occasionally choose to partner with businesses operating in countries or industries which we consider to be high risk, we implement appropriate diligence measures during the onboarding process to assess actual risk of human rights violations. To the extent possible, we privilege local sourcing to foster a more streamlined supply chain and reduce our dealings with unknown



sub-contractors.

ACTIONS TAKEN BY LIGHTSPEED TO ASSESS AND ADDRESS THE RISKS

Our Policies

We have implemented a Code of Conduct and Ethics which is accessible to each of our employees at all times. The Code of Conduct and Ethics outlines our most fundamental shared values and helps our employees understand and comply with our Company policies, applicable laws, and rules and regulations. The Code of 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.

Our third-party suppliers globally are required to sign and comply with our Supplier Code of Conduct, including compliance with labor practices, occupational health and safety and human rights standards, responsible sourcing of minerals and operating with business ethics. We also encourage our partners and suppliers to integrate sustainability into their business operations.

Lightspeed also maintains a Whistleblower Policy which outlines procedures and available channels of communication for reporting concerns about unethical, fraudulent or illegal business conduct. In addition, in order to encourage compliance with these policies and a culture of integrity across the organization, Lightspeed provides an avenue for complaints and disclosures to be made anonymously through our whistleblower reporting hotline.

Each of our current policies, including the Code of Conduct and Ethics and the Whistleblower Policy, is publicly available and disseminated to all stakeholders and routinely reviewed and updated 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. With a view to doing our part to address these issues, we have implemented the measures described in this Statement into our business processes. In



addition, we maintain open communication channels with our subsidiaries worldwide and prioritize direct consultation related to modern slavery prevention.

Board Oversight & Governance

Lightspeed's engagement towards preventing all forms of slavery and human trafficking in its supply chains and across the organization is also reflected in the Company's policies and governance framework. Lightspeed's Board of Directors (the "**Board**") appoints Board committees to foster a culture of honesty and accountability across the Company and to provide oversight on specific matters:

- The Compensation, Nominating and Governance Committee provides general guidance and oversight to the Company regarding matters of corporate governance, including the Company's environmental, social and governance programs, and assists the Board, as required, in interpreting and applying Lightspeed's Code of Conduct and Ethics and other corporate governance policies and processes;
- The Risk Committee oversees legal and regulatory compliance and the effectiveness of the Company's compliance on information system controls, business continuity and risk control, which includes doing business in higher risk areas;
- The Audit Committee oversees Lightspeed's compliance with effective conduct of internal controls and policies, including the Whistleblower Policy.

Additional information concerning our corporate governance structure is available on our [Investor Relations Website](#).

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 Supplier Code of Conduct and Code of Conduct and Ethics. 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.

Contractual Warranties

In addition, during the financial year ending March 31, 2024, Lightspeed intends to work on implementing representations and warranties in its contractual arrangements with suppliers identified as posing a higher risk, based on the various criteria stated above, that such suppliers comply with our Supplier Code of Conduct.

ASSESSMENT EFFECTIVENESS AND CONSULTATION PROCESS

We understand the impact and prevalence of modern slavery in the global supply chain. With a view to doing our part to address these issues, we have implemented the measures described above 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.

LIGHTSPEED ONGOING COMMITMENT TO RESPECT HUMAN RIGHTS

Lightspeed takes its role in ending modern slavery and human trafficking 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.

This joint Statement has been prepared by Lightspeed in consultation with the senior management of each Reporting Subsidiaries. The Lightspeed Board of Directors approved this Statement on May 17, 2023.



Jean Paul Chauvet
Chief Executive Officer

