

California Transparency in Supply Chains Act

California law requires companies to disclose their efforts to eradicate slavery and human trafficking from their direct supply chains for goods offered for sale.

PAR Technologies Corporation (“PAR”) is a global technology company that provides point of sale and management technology solutions to restaurants and retail establishments; and intelligence, surveillance, and reconnaissance solutions and mission systems support to the U.S. and foreign governments. PAR is committed to ensuring that slavery and human trafficking are not taking place in our businesses or supply chains and, to this end, takes the following actions:

- 1) Commitment to Ethical and Compliant Behavior. PAR has adopted a Code of Conduct and a Compliance Handbook, committing to conduct ourselves honestly, ethically, in compliance with the laws, regulations and rules where we operate. With respect to Human Trafficking, our Compliance Handbook states:

PAR does not tolerate trafficking in persons. PAR does not and will not permit its employees, subcontractors, vendors, suppliers, or other entities doing business with PAR to engage in any form of human trafficking. Any violation of human trafficking laws, rules, or regulations will result in immediate referral to law enforcement authorities.

Any suspected violations of laws, rules, or regulations related to human trafficking should be reported immediately to Compliance or the Global Human Trafficking Hotline at (844) 888-FREE or help@befree.org. Retaliation against anyone who reports a suspected violation or files a complaint will be subject to discipline, up to and including termination and referral to law enforcement authorities.

- 2) Supply Chain Expectations. Our suppliers are critical to our success and, in order to provide superior products and services in a responsible manner, we insist that our suppliers meet our expectations for ethics and compliance.
 - a. Supplier Code of Conduct. The PAR Supplier Code of Conduct conveys PAR’s expectation that our suppliers comply with laws and regulations prohibiting human trafficking, not engage in the use of child labor, forced labor, bonded labor, indentured labor, involuntary prison labor, slavery or human trafficking. The PAR Supplier Code of Conduct also provides that suppliers will allow PAR and/or its representatives to assess their compliance, as well as that of their suppliers, vendors and business partners. The PAR Supplier Code of Conduct is available at [link to site].

- b. **Contract Terms.** PAR's standard terms and conditions of purchase require suppliers to comply with all applicable laws and regulations. In addition, our standard contract terms require suppliers to adopt and comply with a code of conduct or policy statement regarding business conduct, ethics and compliance that satisfies, at a minimum, the principles set forth in the PAR Supplier Code of Conduct.
- 3) **Verification of Supply Chain.** PAR engages in verification of product supply chains to evaluate and address the risk of human trafficking and slavery as described herein. This verification is not typically performed by a third party.
 - a. PAR verifies that suppliers are not on any government denied party lists.
 - b. Periodically, in the normal course of business, PAR may conduct a site visit with a supplier. However, PAR does not, in the ordinary course of business, conduct site visits or otherwise evaluate suppliers specifically for the purpose of verifying the eradication of slavery and human trafficking in their supply chains.
- 4) **Supply Chain Audits.** PAR does not, in the normal course of business, conduct audits of suppliers specifically to evaluate their compliance with PAR's requirements regarding human trafficking and slavery in supply chains. Anyone who observes such conduct may ask a question or raise concerns anonymously via PAR's Company Hotline. Additional information about the PAR Company Hotline is available at: www.partechwhistleblower.ethicspoint.com.
- 5) **Supplier Certifications.** Where required as part of its U.S. Government business, PAR requires suppliers to submit certifications that they comply with all U.S. Government rules prohibiting human trafficking and slavery.
- 6) **Internal Accountability Standards.** Compliance with the requirements of the Code of Conduct and Compliance Handbook is mandatory for all PAR employees. PAR requires its employees to annually certify that they have read and understood the Code of Conduct and Compliance Handbook. Violation of either the Code of Conduct or Compliance Handbook will result in appropriate disciplinary action. Anyone who observes or suspects a violation of PAR's Code of Conduct or Compliance Handbook may ask a question or raise concerns anonymously via PAR's Company Hotline.
- 7) **Internal Training.** PAR provides training on human trafficking and slavery to employees and management who have direct responsibility for supply chain management, particularly with respect to mitigation risks within the supply chain of products.