

## Gifts, Entertainment & Travel Policy

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Owner:	Chief Ethics & Compliance Officer	Owner Organization:	Legal Operations
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### 1 PURPOSE

Diebold Nixdorf’s **Code of Business Ethics** requires that we avoid any appearance that business decisions or government action have been influenced as a result of providing or receiving gifts, entertainment, or travel to customers, suppliers, government officials, or other business partners.

This Gifts, Entertainment and Travel Policy (the “Policy”) recognizes that giving or receiving gifts, entertainment or travel may be an appropriate part of a working relationship but prohibits the provision or acceptance of gifts, entertainment, or travel that are lavish or being provided or received for an improper purpose or in violation of any applicable laws. It provides guidelines on permissible gifts, entertainment, and travel to protect Diebold Nixdorf Employees and Third Parties from any allegations of wrongdoing.

### 2 SCOPE

This Policy applies to offering, authorizing, providing, or receiving any gifts, entertainment, or travel to or from any person or third party outside of Diebold Nixdorf (including customers, suppliers, government officials, and other business partners) (collectively “Non-Employees”).

This Policy applies to Diebold Nixdorf’s directors, officers, contingent workers and employees (collectively, “Employees”), and any third parties acting on behalf of the Company, such as agents, resellers, sales partners, distributors, joint venture partners, consultants, suppliers, and other representatives, including all High Risk Third

Parties engaged in Diebold Nixdorf business (as defined in the **Third Party Enhanced Screening Procedure**) (collectively “Third Parties”).

### 3 REQUIREMENTS

Giving or receiving gifts, entertainment, and travel must meet the requirements of sections 3.1 and 3.2, below. Where giving or receiving a gift, entertainment, or travel may present a higher risk of corruption, it must be disclosed and pre-approved (Section 3.3).

Take particular care offering gifts and hospitality to, or receiving them from, government/public officials as this is a higher risk area and actions could be misinterpreted leading to: a possible breach of the law; bad publicity for Diebold Nixdorf and other significant consequences.

Also avoid giving repeat gifts and entertainment to the same recipients

Any non-compliance with this Policy may lead to disciplinary action for Employees which could include dismissal. DN may also terminate relationships with Third Parties if they breach this Policy.

#### 3.1 Required Criteria

Any gift, entertainment, or travel offered, authorized, provided, or received by Diebold Nixdorf Employees or Third Parties must always be:

- Modest and infrequent;
- Legal under the laws of the U.S. and the country in which it would be provided and, to your knowledge, allowed by the recipient’s employer;
- For a legitimate purpose in the routine course of business;
- Provided transparently; and
- Permissible under any additional Diebold Nixdorf regional or country requirements.

#### 3.2 Prohibited Criteria

Any gift, entertainment, or travel offered, provided, or received by Diebold Nixdorf Employees or Third Parties must never be:

- Lavish or excessive;
- Intended to improperly influence anyone or be in exchange for improper favors or benefits;
- In the form of cash or a cash equivalent (including gift cards or certificates);
- Sexually-oriented, embarrassing to Diebold Nixdorf if its provision became public knowledge, or otherwise in poor taste; or
- Known to be contrary to the recipient’s employer’s policies.

Diebold Nixdorf or its Third Parties must not pay for non-business related travel. Leisure trips before or after business related travel must not be paid for.

#### 3.3 Pre-Approval

When gifts, entertainment, or travel meet any of the criteria below, you must fully disclose it and receive approval before offering, authorizing, providing, or receiving it.

All approvals are handled through **ComplianceDesktop** (see Section 3.5 below) following the **Gifts, Entertainment & Travel Disclosure and Approval Procedure**.

Where the gift, entertainment or travel is being provided by a Diebold Nixdorf Third Party, then the request for pre-approval should be made by the Diebold Nixdorf business manager on behalf of the Third Party.

## Travel

Travel under this Policy means the costs associated with the transportation and lodging of a Non-Employee, such as hotel expenses, airfare, and other long-distance travel arrangements. **You must fully disclose and receive approval before offering, authorizing, or providing any Travel to any Non Employee or their family or friends.** This includes customers, suppliers, journalists, sales partners, and government officials.

## Gifts and Entertainment

Gifts include anything of value given to or received from a Non-Employee, such as pens, calendars, mugs, clothing, wine/alcohol, candy or fruit baskets, or tickets to an industry event, other event, or outing (including golf outings and tickets to sporting events) where the person providing the tickets is not present.

Business Entertainment means any social activity in which an Employee or Third Party participates with a Non-Employee recipient, and during which they discuss legitimate business matters.

- If there is no such discussion (e.g., at a golf outing where the recipient and provider are in different groups and do not interact) or if the Employee or Third Party is not present, the entertainment is a Gift.

**You must fully disclose and receive approval before offering, authorizing, providing, or receiving any Gift or Business Entertainment when:**

- It relates to a friend or family member of a business or government contact, rather than a contact him or herself; or
- A bid process or deal involving Diebold Nixdorf is imminent with the recipient or giver; or
- The total value per individual to a recipient would exceed the following thresholds<sup>1</sup> (or any stricter local or regional threshold); thresholds apply based on the location of the Employee or Recipient:

Region	Gifts (USD)	Business Entertainment (USD)
North America	\$75	\$150
Asia Pacific excluding Singapore	\$50	\$100
Latin America	\$50	\$100
EMEA—EU Countries, UK, Switzerland, Norway, UAE. Also Singapore	\$75	\$150
EMEA—countries not listed above	\$50	\$100

In some cases, the cost of a Business Entertainment expense may unexpectedly rise above the applicable threshold. If this occurs, you must fully disclose the Business Entertainment for post-approval as soon as possible but no later than 2 weeks after it was provided. If a request is made more than 2 weeks after entertainment was provided, then it may not be reimbursed. Failure to obtain approval in advance will not violate this policy if it arose from a reasonable, good faith belief that the expense would not exceed the threshold.

## Charitable & Political Donations & Sponsorship

Charitable and political donations and sponsorship are special categories subject to additional rules. Please see the **Charitable Donations Policy**, the **Political Donations & Activities Policy** and the **Sponsorship Policy**.

<sup>1</sup> The threshold is the amount above which compliance clearance is required. It may be possible to offer or receive a gift or entertainment above these thresholds but only if compliance approval has been given in advance.

### 3.4 Local / Regional Policies Also Apply

Some regions and countries in which Diebold Nixdorf operates, including the U.S., have requirements that are stricter than those in this Global policy. You must adhere to all applicable regional or country policies and laws in addition to this Global policy.

### 3.5 ComplianceDesktop

**ComplianceDesktop** is Diebold Nixdorf’s centralized, electronic system for the disclosure, approval, and management of gifts, travel, and entertainment.

### 3.6 Expenses

Employees must accurately and transparently describe any gifts and entertainment and travel offered to Non-employees in their expense claims including the names of recipients.

Third Parties must accurately and transparently describe any gifts and entertainment and travel offered in the course of Diebold Nixdorf business in their books and records.

## 4 REPORTING & NON-RETALIATION

If you are aware of or suspect any violations of this Policy, it is your duty and responsibility to report that violation to management or through the EthicsPoint hotline, which is available by telephone at 1-866-ETHICSP (1-866-384-4277) and online at <http://www.ethicspoint.com>. DN’s **Whistleblower and Non-Retaliation Policy** protects you from retaliation for any good faith report.

## 5 CONTACTS

If you have any questions or comments regarding this policy, please contact the Ethics and Compliance Team ([Compliance@dieboldnixdorf.com](mailto:Compliance@dieboldnixdorf.com)).

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## 6 RELATED DOCUMENTS / REFERENCES

Title	Number
Code of Business Ethics	GPP10-01
Gifts, Entertainment & Travel Disclosure and Approval Procedure	GPP10-10.001
Third Party Enhanced Screening Procedure	GPP10-15.001
Charitable Donations Policy	GPP10-11
Political Donations & Activities Policy	GPP10-12
Sponsorship Policy	GPP10-31
Whistleblower and Non-Retaliation Policy	GPP10-03

## 7 HISTORY

Revision	Date	Comment	By
1	10/2016	Original Release	Chief Ethics & Compliance Officer
2	07/2017	Format updated, links updated	Global Compliance Counsel
3	02/2020	Review and update	Chief Ethics & Compliance Officer
4	06/2021	Review and update	Chief Ethics & Compliance Officer