

# A Statement for UK Modern Slavery Act, California Transparency in Supply Chain Act and the German Act on Corporate Due Diligence Obligations in Supply Chains

## Introduction

Diebold Nixdorf is committed to conducting our business in an ethical and socially responsible manner. Modern Slavery and failure to respect human rights is not acceptable in our own operations or in those companies who work with us or on our behalf. In our own operations we are committed to sustainable development and respect for the environment and we expect our suppliers to adhere to these principles too.

We recognize that modern slavery, the respect of human rights and the respect for our planet are growing issues throughout the world and are continuing to take steps to maintain and monitor our operations and supply chain to ensure that our products and solutions are created in an environment that respects human rights and promotes sustainability. There is no place for slavery; human trafficking; servitude and forced or compulsory labor in our supply chain.

This policy statement outlines our company’s approach to ensuring human rights protection and environmental compliance in accordance with the UK Modern Slavery Act, the California Transparency in Supply Chain Act, and the German Act on Corporate Due Diligence Obligations in Supply Chains (“Lieferkettensorgfaltspflichtengesetz”).



## Our Business

Diebold Nixdorf, Incorporated (NYSE: DBD) (Diebold Nixdorf) is a world leader in enabling connected commerce. We automate, digitize and transform the way people bank and shop. As a partner to the majority of the world's top 100 financial institutions and top 25 global retailers, our integrated solutions connect digital and physical channels conveniently, securely and efficiently for millions of consumers each day. We have a presence in more than 100 countries with approximately 21,000 employees worldwide.

Diebold Nixdorf, Incorporated is listed on the New York Stock Exchange. In the U.K. we operate through our trading subsidiary, Diebold Nixdorf (U.K.) Ltd. In Germany we mainly operate through our trading subsidiaries WINCOR NIXDORF International GmbH, Diebold Nixdorf Systems GmbH, and Diebold Nixdorf Deutschland GmbH. The Boards of Directors of these companies have signed this declaration. Our financial year ends on 31 December.

## Company Policies

Diebold Nixdorf's [Code of Business Ethics](#) is the foundation for all of our policies and demonstrates our commitment to international labor and human rights standards and to act in an environmentally conscious way.

Our Modern Slavery Policy specifically prohibits any form of human trafficking or forced labor, including withholding personal papers, deposits or compensation, excessive and involuntary overtime, and inappropriate loans or salary advances that tie workers to the workplace.

Our [Global Human Rights policy](#) formalizes Diebold Nixdorf's well – established efforts and continuing commitment to support the human rights of all people consistent with the UN Guiding Principles on Business and Human Rights ( UN Guiding Principles).

We annually refresh our [Supplier Code of Conduct](#) to clearly indicate to our suppliers our requirements in respect of human rights, modern slavery, and sustainability.

Our Supplier Code of Conduct is based upon the fundamental rights and standards of treatment as set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization's declaration on Fundamental Principles and Rights at Work.

Other relevant policies include our:

- Third Party Policy
- Whistleblower and Non-Retaliation Policy
- Global Environmental Health and Safety Policy
- [Global Sustainability Policy](#)
- Global Diversity, Inclusion and Sensitivity Policy
- Equal Employment Opportunity Policy
- Conflict Mineral Policy

All of our officers, directors, employees and contingent workers are required to follow these policies.

All Diebold Nixdorf policies are signed off by senior management as part of our Global Policy Committee, and they are published on our policy portal, which is accessible by all Diebold Nixdorf people. Many of our policies are publicly available on [www.dieboldnixdorf.com](http://www.dieboldnixdorf.com).

Our policies are reviewed annually to make sure that they are in line with best practice and applicable laws and regulations.

## Training

All our employees and contingent workers are required to complete an online Code of Business Ethics training on joining and annually thereafter. This includes signing and agreeing to comply with our Code of Business Ethics policy.

We are continuing to roll out more focused training on human rights, modern slavery and sustainability to Diebold Nixdorf people in our procurement and supply chain so they know how to spot the signs of modern slavery and gain a general understanding of Global Supply Chain Compliance and Supply Chain Transparency and know where to go to report concerns. Training for our suppliers, especially for our direct suppliers, is also planned for 2024.

## Risk Assessment and Due Diligence

We want to make sure that the violation of human rights (including modern slavery) and environmental abuses are not taking place either in our own business or in our supply chain.

Diebold Nixdorf manufactures banking and retail hardware such as ATMs and retail sales hardware such as POS (Point of Sale) terminals at our own facilities in the U.S., Germany, Brazil, at our contract manufacturer in India and at our joint venture facility in China. We use global supply chain resources to provide raw materials and components.

In our own facilities, we adhere to all international and local labor standards, and we work with our contract manufacturer and joint venture partner to ensure they do the same.

We consider that the risk of human rights violation within our own operations is low as most of our people are highly skilled, we have standardized global recruitment policies that we monitor carefully, and we have clear policies on environmental health and safety and sustainability.

We have therefore put in place measures to assess and manage risks.

Our risk analysis of our supply chain includes the process steps of risk identification, risk assessment, risk prioritisation and documentation.

It starts by looking at general criteria such as country and sector risks to enable an initial risk assessment.

Using a risk tool from an external provider, we assess the background risk of possible human rights and/or environmental risks in the individual countries of the world.

We then apply this to DN suppliers by considering the country in which they are based, the product group which they are supplying and their annual revenue with DN.

We believe the risk of human rights violations and adverse environmental impacts in our direct supply chain is low, but we recognize that the risks of human rights and environmental violation may be greater further up our supply chain despite the processes and procedures in place because DN does not directly control those operations. We are therefore seeking to place obligations on our direct suppliers to conduct appropriate due diligence on their suppliers.

## Supply Chain Due Diligence

Since 2017, all our potential new suppliers have been set up and screened in our Compliance Desktop tool before being accepted as a supplier.

As part of that screening process, the supplier must answer questions about the use of forced labor in its operations. We also ask suppliers whether they disclose Environmental, Social, and Governance (ESG) or Sustainability information to a third-party organization and whether they are willing to complete an ESG survey

managed by Diebold Nixdorf. If the supplier responds in a way that alerts us to a potential risk, then enhanced due diligence would take place.

In 2023 we created an enhanced questionnaire which was sent to all suppliers in the higher risk categories (based on our risk analysis as described above) to obtain further reassurance about their commitment to our human rights and environmental principles.

We have an audit program for our key suppliers. Typically, these are carried out by Diebold Nixdorf people and are scheduled with the supplier. With the reduction of COVID restrictions, we were able to conduct supplier audits again in both Europe and Asia in the past reporting year. This year, based on our risk assessment, where we consider a supplier to be in a higher risk category from a modern slavery or human rights perspective, we are building into our audits questions to ensure we understand the reality of working conditions. If we have concerns, then we will put in place measures and track progress against the plan. If a supplier does not make the necessary improvements, then we may cancel the contract.

For several years, we have carried out due diligence to ensure that conflict minerals are not used in our supply chain by seeking reassurances from those direct suppliers where we perceive there may be a greater risk. This process will continue in 2024.

If it is determined that there is a risk that the activities of our suppliers are causing or contributing to negative human rights or environmental impacts, we have a process in place to assess, modify, stop and/or correct the activity.

## Diebold Nixdorf People

Diebold Nixdorf has approximately 21,000 employees. In 2020, we set up a CARE Council. CARE stands for Considerate, Aware, Responsible and Empathetic. Our CARE Council works cross-functionally through employees around the globe to support DN's clearly stated, measurable goals to increase diversity, inclusion, equity and respect in the workplace.

In 2021, we set up employee resource groups (ERGs) as part of the CARE Council. These are voluntary, self-sustaining, employee-led groups that bring members together based on shared characteristics, social identity or life experiences. They promote a diverse, inclusive workplace aligned with our Diversity and Inclusion (D&I) goals. The number of ERGs and the number of employees participating in ERGs continues to grow.

We have global recruitment processes to ensure that hiring is performed to company requirements including our commitment to labor and human rights standards. Our processes are set out in our Global Talent Acquisition Policy, and all hiring, and terms and conditions offered to future employees, are overseen by a Diebold Nixdorf talent acquisition partner. Likewise, all compensation and benefits offered to Diebold Nixdorf employees are overseen by our Compensation and Benefits professionals.

## Governance

Our program to mitigate the risks of modern slavery and human rights violations and environmental risks occurring within our business or with our end-to-end supply chain is sponsored and fully supported by our Board of Directors.

We have a Global Sustainability Council made up of senior managers across functions, including our Environmental, Health & Safety team; Ethics & Compliance; Human Resources; Procurement; Manufacturing and R&D; Internal Audit; and Legal. This Council monitors our progress to ensure we manage risk appropriately and ensure a zero tolerance for human rights violation and all associated risks and consequences throughout our business and downward supply chain. It develops KPIs to track progress.

## Reporting

We have a [whistleblowing hotline](#) where Diebold Nixdorf people and third parties outside the company can raise any ethical concerns, including any concerns about human rights, modern slavery and environmental

violations. If a concern is raised, it would be investigated fully by our dedicated ethics and compliance professionals and our regional Ethics Committees would oversee and ultimately decide on any action required.

We also have a non-retaliation policy so that when our people raise a concern in good faith, they know, even if the concern ends up not being well – founded, that they will not be retaliated against.

The [procedure for complaints](#) of Diebold Nixdorf as required by the German Supply Chain Law (LkSG), has been made available on the global Diebold Nixdorf website.

This is our statement for our financial year ending 31 December 2023. Diebold Nixdorf is committed to being a responsible business and to respecting human rights. We are against all forms of human rights (including modern slavery) and environmental violations everywhere.

We welcome feedback at [compliance@dieboldnixdorf.com](mailto:compliance@dieboldnixdorf.com)

### **The boards of directors for the following companies have approved this Statement.**

Diebold Nixdorf, Incorporated

Diebold Nixdorf (UK) Limited

Diebold Nixdorf Holding Germany GmbH