

Conflict Minerals Policy

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Owner:	VP Ethics & Compliance	Owner Organization:	Ethics & Compliance
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1 PURPOSE

The purpose of this Conflict Minerals Policy (the “Policy”) and the related [Modern Slavery](#) and [Global Human Rights](#) Policies is to promote compliance with all laws and regulations addressing Conflict Minerals and Modern Slavery (as defined below), including the U.S. Securities and Exchange Commission (“SEC”) Conflict Minerals Rule, the California Transparency in Supply Chains Act of 2010, and the UK Modern Slavery Act of 2015; and (2) to promote responsible sourcing of Conflict Minerals and to promote the eradication of Modern Slavery from Diebold Nixdorf’s supply chain (to the extent either exists therein).

2 SCOPE

This Policy applies to all directors, officers, and employees (collectively “employees”) acting on behalf of Diebold Nixdorf and its worldwide subsidiaries and affiliates (“Diebold Nixdorf” or the “Organization”).

3 DEFINITIONS

Conflict Minerals are columbite – tantalite (tantalum ore), cassiterite (tin ore), gold, wolframite (tungsten ore) or their derivatives (tantalum, tin, tungsten and gold).

Covered Countries are the Democratic Republic of the Congo and all adjoining countries.

4 REQUIREMENT

4.1 Committee

A Diebold Nixdorf Sustainability Committee (“Committee”) consists of the following members:

- A delegate from Direct Procurement
- Vice President, Internal Audit
- A delegate from Indirect Procurement
- A delegate from the Ethics and Compliance Department
- A delegate from the Communications Department
- A Conflict Minerals Program Manager appointed by the Chairperson
- Additional members as deemed necessary
- A delegate from Legal

The Committee shall meet not less than four times per calendar year to discuss and set Company objectives and monitor compliance with this Policy.

4.2 Country of Origin Inquiry

At least annually, as directed by the Committee and in compliance with the SEC’s Conflict Minerals Rule, the Procurement Department will lead a reasonable country of origin inquiry (“RCOI”) into the origin of the Conflict Minerals in Diebold’s products, if any. If it determines that Conflict Minerals are or may be sourced from Covered Countries, the Procurement Department must lead a due diligence effort with the objective of enhancing transparency and attempting to identify the country, chain of custody, and smelter or refiner of origin of Conflict Minerals that may be used in Diebold Nixdorf’s products.

The [Supplier Code of Conduct](#) requires Diebold Nixdorf’s suppliers to respond to Diebold Nixdorf’s RCOI and due diligence processes and provide complete and accurate information when requested by Diebold Nixdorf.

All information and findings from the RCOI and due diligence process must be recorded and retained for 5 years in a centralized Company system maintained by the Procurement Department.

Diebold Nixdorf’s RCOI and due diligence processes and the findings will be described in an annual conflict minerals disclosure, which will be filed with the SEC as required by the SEC’s Conflict Minerals Rule.

5 CONTACTS

If you have any questions regarding this guideline, please contact Ethics & Compliance Department (compliance@dieboldnixdorf.com).

If you are aware of any violations of this Policy, it is your duty to report that violation to management or through the EthicsPoint hotline, which is available by telephone at 1-866ETHICSP (1-866-384-4277) and online at <http://www.ethicspoint.com>.

6 RELATED DOCUMENTS / REFERENCES

Title	Number
Code of Business Ethics	GPP10-01
Supplier Code of Conduct	GPP85-01
Modern Slavery Policy	GPP85-11
Global Human Rights Policy	GPP65-39

7 HISTORY

Revision	Date	Comment	By
1	2/2016	Original Release	Director, Legal & Compliance – Global Supply Chain
2	2/2017	Reviewed for Content; Titles Updated	Head of Product Sourcing – Americas
3	8/2020	Formatting changes and content review	Legal Operations and Procurement
4	3/2023	Content review	Ethics and Compliance