

Conflict Minerals Policy

1 Purpose

The purpose of this Conflict Minerals Policy (the “Policy”) and the related Modern Slavery Policy 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 Requirements

Diebold Nixdorf shall comply with all applicable laws and regulations addressing Conflict Minerals, including the SEC’s Conflict Minerals Rule.

4.1 Committee

A Diebold Nixdorf Conflict Minerals Management Committee (“Committee”) is established and consists of the following members:

- Head of Product Sourcing – Americas (Chairperson)
- Vice President, Internal Audit
- A delegate from the Procurement Department
- A delegate from the Ethics and Compliance Department
- A delegate from the Communications Department
- A Conflict Minerals Program Manager appointed by the Chairperson (who shall serve as Secretary of the Committee and be responsible for ensuring execution of Committee objectives)
- Additional members as deemed necessary

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.

Pursuant to the [Supplier Code of Conduct](#), Diebold Nixdorf’s suppliers are required 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 thereof 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 or comments regarding this Policy, please contact the Ethics and 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 confidential EthicsPoint hotline, which is available by telephone at 1-866-ETHICSP (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