

# Modern Slavery Policy

## 1 PURPOSE

The purpose of this Modern Slavery Policy (the “Policy”) and the related Conflict Minerals Policy is to (1) 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

Modern Slavery is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

## 4 REQUIREMENTS

Diebold Nixdorf will comply with all applicable laws and regulations addressing Modern Slavery, including the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015.

Diebold Nixdorf’s Director of Strategic Sourcing will appoint a Modern Slavery Program Manager who must evaluate at least annually the Organization’s processes and controls that address Modern Slavery in Diebold Nixdorf’s supply chain. The areas for evaluation include, but are not limited to, the following:

- Verification – Evaluate the extent, if any, the Organization engages in verification activities to identify, assess, and manage the risks of Modern Slavery in Diebold Nixdorf’s supply chains and whether the Organization uses a third party verifier.
- Audit – Evaluate the extent, if any, the Organization audits suppliers in assessing compliance with the Organization’s standards for Modern Slavery in its supplychains and whether such audits are independent and unannounced.
- Certification – Evaluate the extent, if any, the Organization requires suppliers to certify that materials incorporated into the product comply with the laws regarding Modern Slavery in the country or countries in which they are doing business.
- Internal Accountability – Evaluate the extent, if any, the Organization has internal procedures for determining whether employees, contractors, and suppliers are complying with Organization standards regarding Modern Slavery.



- Training – Evaluate the extent, if any, that the Organization provides training on Modern Slavery to employees who have direct responsibility for supply chain management, particularly with respect to mitigating risks within the supply chain.

Upon completion of the Modern Slavery Program Manager’s evaluation, he or she will make recommendations to the Director of Strategic Sourcing, as necessary. Findings and conclusions from the evaluation will be summarized and disclosed on the Organization’s website at least annually, as required by the California Transparency in Supply Chains Act of 2010 and the UK Modern Slavery Act of 2015 .

## 5 CONTACTS

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

Title	Number
Code of Business Ethics	GPP10-01
Supplier Code of Conduct	GPP85-01
Conflict Minerals Policy	GPP85-10