Gifts, Entertainment & Travel Approval Request Procedure

Number:	GPP10-10.001 GL/en	Scope:	Global
Owner:	Chief Ethics & Compliance Officer	Owner Organization:	Legal Operations
Original Effective:	10/01/2016	Last Updated:	06/30/2021
Security Classification:	Public	Category:	Ethics & Compliance

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1 PURPOSE

To provide required steps and useful information for submitting approval requests under Diebold Nixdorf's **Gifts, Entertainment and Travel Policy**.

2 SCOPE

This Procedure applies to all requests for gifts, entertainment or travel covered by the **Gifts, Entertainment & Travel Policy**. Requests for sponsorship or for charitable contributions are covered by the **Sponsorship** and **Charitable Contributions** policies.

3 REQUIREMENTS

3.1 Requesting Approval in ComplianceDesktop

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

When the **Gifts, Entertainment & Travel Policy**, and/or any applicable local policy, requires you to obtain approval for a gift, entertainment or travel benefit, you must submit a "declaration"—or request for approval—through the ComplianceDesktop "GTE" tab (for Gifts, Travel, and Entertainment).

There are 3 components to the process:

STEP 1: Describe the event or occasion;

STEP 2: Identify the recipients; and

STEP 3: Describe the benefit (gift, entertainment, or travel) you are requesting.

3.1.1 STEP 1: Describe the Event or Occasion

3.1.1.1 Event or Occasion Name, Description and Date(s)

The same process is used in ComplianceDesktop whether the approval is for a one-time gift or for a combination of gifts, entertainment, and travel associated with a trade show, training, or other event.

When starting your request, the system prompts for an event "Name." In the case of an actual event, use its most official name. If your request is not associated with a particular event, enter a few words succinctly describing the occasion (e.g., Chinese New Year Greeting).

After naming the event or occasion, the system may prompt you to enter a brief description of it and its start and end dates. For events or occasions on one day, simply choose that date at both prompts.

3.1.1.2 Benefit Template(s) Selection

After describing the event or occasion, specify whether approval is requested for a gift, entertainment, travel expense, or some combination of these, and select the template(s) associated with each applicable category.

Do not submit an approval request using a template for a different benefit category (e.g., submit a gift request using the entertainment form), as this could delay review and approval. The following information will help you distinguish between benefit categories:

Gifts includes items provided to a third party, such as clothing, wine, or anything else of value. Social activities or tickets to an event are gifts if no business interaction will occur (e.g., a sporting event where you will not interact with your business contact at the event).

Entertainment is any social activity in which the Diebold Nixdorf person or Third Party both participate and during which legitimate business interaction occurs. A business meal is a good example.

Travel refers to the airfare, ground transportation, lodging, meals, seminar/training fees, and other expenses associated with attending an event.

3.1.2 STEP 2: Identify the Recipients (repeats for each benefit category)

For each category (gift, entertainment, and/or travel), the system prompts you to identify the recipients. The list of recipients can differ for each category. For example, you could request a gift to 100 event attendees, entertainment for 10 attendees, and travel for 5 attendees—all within the same event declaration.

Recipients can be entered individually or as a batch via a spreadsheet. The spreadsheet must be in a **specific format**, which can be downloaded directly from the recipient entry screen. Once the recipients have been entered for one benefit category, the you have the option to import that list into the next benefit.

Within each benefit category, the system prompts for the value each recipient would receive. Enter just the value for that benefit category. (You must separately identify the recipients for any other benefit categories and will be prompted for the values of those benefits at that time.)

If a recipient will receive more than one item within a benefit category, though, such as more than one gift, enter the TOTAL amount for that category when prompted for the value. For example, to request approval of a $50 Diebold Nixdorf backpack, a $25 Diebold Nixdorf pen, and a $25 Diebold Nixdorf shirt for one event attendee, enter **$100** ($50 + $25 + $25) as the gift value. Be sure to list each item separately later, when prompted to describe the gifts.

3.1.3 STEP 3: Describe the Benefit Being Requested

Follow the prompts, which may change depending on answers to prior questions. Answer all questions fully, accurately, and honestly.

Once you have completed the questions applicable to each benefit category, certified the request, and submitted the declaration, ComplianceDesktop sends a confirmation email to you and a notification email to the approver who will review the request. These and other emails from the system will reference a specific Declaration ID and/or Benefit ID.

3.2 Monitoring Your Request

The confirmation email you will receive includes a link to the request on ComplianceDesktop. You can use that link to monitor the status of the request and to respond to questions that may be posed by the reviewer(s).

3.3 Receiving Approval or Rejection in ComplianceDesktop

Once a decision has been made regarding the request, you will receive a formal email notification of the decision. That email is your only official documentation of the request outcome. You must not provide any gift, travel or entertainment until formal email approval has been received for that request from ComplianceDesktop.

3.4 Submitting an Expense Report with a CompliaceDesktop Approval

For approved requests, be sure to save the ComplianceDesktop email notification of the final approval of the request. Depending on your local requirements, you may need to attach a copy of that email and/or identify the Declaration ID/Benefit ID with your expense report when seeking reimbursement from Diebold Nixdorf for a gift, entertainment, or travel expense. If you did not receive a required approval, you will not receive reimbursement for the expense unless approved by the Chief Ethics & Compliance Officer.

3.5 Reimbursing for Gift, Entertainment & Travel Expenses

When any gift, entertainment, or travel expense claims are submitted , accounting and finance staff will not make the reimbursement unless:

- It is within the regional and applicable local thresholds in Diebold Nixdorf's **Gift, Entertainment & Travel Policy** and any applicable local policies; OR
- The request has been formally approved through ComplianceDesktop; OR
- The request or approval was inadequate, but the expense has been vetted and approved after-the-fact by the Chief Ethics & Compliance Officer.

4 CONTACTS

If you have any questions or comments regarding this Procedure, please contact the Ethics and Compliance Team or 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 (1-866-382-4277) and online at http://www.ethicspoint.com.

5 RELATED DOCUMENTS / REFERENCES

Title	Number
Code of Business Ethics	GPP10-01
Gifts, Entertainment & Travel Policy	GPP10-10
Third Parties Enhanced Screening Procedure	GPP10-15.001
Template Budget for Travel Request	GPP10-10.001-012
Template Travel and Event Schedule	GPP10-10.001-010

6 HISTORY

Revision	Date	Comment	By
1	10/2016	Original Release	Chief Ethics & Compliance Officer
2	02/2020	Review and format update	Chief Ethics & Compliance Officer
3	06/2021	Review and update	Chief Ethics & Compliance Officer