

**Diebold Nixdorf Canada Limited Report on the measures taken to prevent and reduce the risk that forced labor or child labor.**

**I. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

**Structure:**

**Reporting entity's legal name:** Diebold Nixdorf Canada Limited

**Financial reporting year:** January – December 2024

**Identification of a revised report:** First report.

**Business number(s), if applicable:** 123321341

**Identification of reporting obligations in other jurisdictions:** Diebold Nixdorf Canada Limited doesn't have reporting obligations in other jurisdictions.

**Entity categorization according to the Act:** Corporation

**Sector/industry:** Private Sector / Sales to Financial and retail technology industry.

**Location:** Ontario, Canada

DIEBOLD NIXDORF CANADA LIMITED (Diebold Nixdorf Canada) Limited is a corporation registered under the Governing Jurisdiction of Canada – Ontario. Diebold Nixdorf Canada's parent company is Diebold Nixdorf, Inc. a US corporation listed on the New York Stock Exchange.

Diebold Nixdorf Canada Ltd is overseen and managed by its parent company Diebold Nixdorf Inc.'s Executive Leadership Team consisting of an Executive Vice President and Chief Financial Officer, an Executive Vice President, Global Banking, an Executive Vice President, Global Retail, an Executive Vice President, Operational Excellence, an Executive Vice President, Chief Legal Officer & Corporate Secretary, a Sr Vice President & Chief Information Officer, a Chief People Officer, and a Vice President, Chief Ethics and Compliance Officer.

[Leadership | Diebold Nixdorf](#)

Diebold Nixdorf Canada has a workforce of approximately 489 employees.

**Activities**

Diebold Nixdorf Canada offers a broad portfolio of solutions designed to automate, digitize, and transform the way people bank and shop. As a result, our operating structure is focused on two customer segments: Banking and Retail. Leveraging a broad portfolio of solutions, Diebold Nixdorf gives customers the flexibility to purchase the combination of services, software and products that drive the most value to their business.

**Supply Chain**

Diebold Nixdorf Canada imports banking and retail products for sale to and use by banks and retailers across Canada in banking and retail transactions. DN Canada Limited also uses DN global

supply chain resources and processes to obtain components, software or goods to repair or to integrate into the products and solutions offered to end customers in Canada. As a result, Diebold Canada imports automated teller machines which make up 80% of its Canadian imports. These machines are assembled by its parent company's subsidiaries in Germany (69%), by Diebold Nixdorf Inc.'s contract manufacturer in India (4%), by Diebold Nixdorf in the United States (7%). Retail point of sale machines are assembled by its parent company's subsidiaries in Germany and make up 2 % of Canadian imports. As part of a multinational, DN Canada Limited also uses a global supply chain resources and processes to the goods to repair, upgrade, and integrate into the products and solutions offered to end customers. These components are imported primarily from Diebold Nixdorf in the United States, representing the remaining 18% of imports. The components primarily originate in Germany (~58%) and most of the remainder are from suppliers (in order by decreasing volume totaling ~42%) across the United States, China, Mexico, Switzerland, Japan, Malaysia, Italy, Denmark, Indonesia, Vietnam, Taiwan, Romania, Philippines, and the United Kingdom.

## **II. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR**

### **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 exploitation of children, 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 review our [Supplier Code of Conduct](#) (SCOC) to clearly indicate to our suppliers our requirements in respect of human rights, modern slavery, and sustainability, and refresh the code if necessary.

Our SCOC 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 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.

### **Supply Chain Due Diligence**

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

As part of that screening process, the supplier must answer questions to detect and prevent 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. This questionnaire is now an integral part of our annual risk analysis. In addition, this questionnaire is sent to new suppliers during the onboarding process if they are classified as high-risk suppliers based on their country of origin, product group and turnover.

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 continued in 2024.

### **III. PARTS OF OUR BUSINESS AND SUPPLY CHAIN THAT CARRY A RISK OF FORCED LABOR OR CHILD LABOR TO BE USED AND THE STEPS TAKEN TO ASSESS AND MITIGATE THAT RISK**

Diebold Nixdorf Canada 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, forced labor and child labor, 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; child labor, servitude and forced or compulsory labor in our supply chain.

Our Modern Slavery, Global Human Rights and Global Diversity, Inclusion and Sensitivity policies formalize 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). These policies are only part of Diebold Nixdorf's responsible and sustainable business practices in our own operations and throughout our supply chain and value chain.

Diebold Nixdorf Canada identifies and addresses any actual or potential adverse impacts with which we may be involved either directly or indirectly through our activities or business relationships. For example, Diebold Nixdorf Canada suppliers play a critical role in sourcing responsibly and sustainably. Diebold Nixdorf Canada will partner with our suppliers to drive toward the adoption of these human rights standards. Diebold Nixdorf Canada currently directs suppliers to abide by company policies that seek to protect human rights, such as our policies on Code of Business Ethics (COBE), Supplier Code of Conduct (SCOC), and use of Conflict Minerals and Modern Slavery. We will also aid our suppliers in complying with human rights directives. In reviewing and remediating human rights impacts, Diebold Nixdorf Canada will follow certain processes, including:



At Diebold Nixdorf Canada, we recognize everyone's dignity and equality wherever they are in the world. We strive to respect and promote human rights in accordance with local and international standards, including the UN Guiding Principles. Our goal is to help increase the enjoyment of human rights within the communities in which we operate. We provide fair working conditions and expect our suppliers and business partners to do the same. No form of modern slavery is acceptable within Diebold Nixdorf or within companies that work with or for us.

#### **Our own workforce.**

We consider the risk of modern slavery within our own operations to be low as most of our people are highly skilled, and we have standardized global recruitment policies that we monitor carefully. In our own facilities, we adhere to labor standards, and our parent company Diebold Nixdorf Inc. works with its joint venture partner and contract manufacturer to ensure they do the same. All our employees and contingent workers are required to complete online COBE training upon joining the company and annually thereafter. This includes signing and agreeing to comply with our COBE Policy. In 2021, we included a module on modern slavery as part of our COBE training. We also intend to introduce more focused training on modern slavery to our Procurement and Supply Chain teams to help them spot the signs of forced labor and identify where to report concerns. Our aim is to share practical case studies and demonstrate the day-to-day steps to prevent modern slavery in our business and supply chain.

### **Our Supply Chain.**

Diebold Nixdorf Canada suppliers represent an extension of our company, and all Diebold Nixdorf Canada suppliers must adhere to all applicable laws, regardless of jurisdiction. We also expect suppliers to promote diversity and good corporate citizenship and respect human rights. Additionally, we ask that all suppliers meet and exceed environmental, health and safety standards and support a sustainable and transparent supply chain, including responsible mineral sourcing practices. Compliance with our SCOC is incumbent on our suppliers. We have set socio-environmental expectations for our suppliers, including a ban on the use of forced or bonded labor and child labor in our Modern Slavery Policy. Annually our parent company Diebold Nixdorf Inc. publishes 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, which sets out our commitments in this area and describes our activities. The commitments and activities described are applicable to Diebold Nixdorf Canada and all parent company's subsidiaries worldwide.

We want to make sure that the violation of human rights (including modern slavery, forced labor and child labor) and environmental abuses are not taking place either in our own business or in our supply chain. 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 prioritization 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 Diebold Nixdorf suppliers by considering the country in which they are based, the product group which they are supplying and their annual revenue with Diebold Nixdorf.

We undertake enhanced due diligence on DN suppliers in a higher risk category based on this analysis.

We believe the risk of human rights violations and adverse environmental impacts in our direct supply chain is also 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 Diebold Nixdorf Canada do not directly control those operations. We therefore conduct risk assessments and due diligence to mitigate these risks and are seeking to place obligations in our direct suppliers to do the same on their suppliers. All our potential new suppliers are compliance screened before being accepted as a supplier. This screening requires information about our suppliers' ethics programs and includes questions on data privacy, modern slavery, forced and child labor, and diversity, and ensures they either sign an agreement to comply with our COBE and all relevant policies and procedures or that they demonstrate they have equivalent policies in place.

We also ask suppliers whether they disclose 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. For certain suppliers that are perceived as strategic or higher risk we also carry out audits. Diebold Nixdorf's suppliers are evaluated regularly. The results are considered in the development of departmental strategy and risk management. As part of supplier management, we foster the supplier-customer relationship globally and develop it further in accordance with our mission of ensuring high quality. Regular performance reviews with strategic suppliers help improve the supply process continuously in a spirit of partnership and with an eye to making it best-in-class. By embedding sustainability practices and principles throughout our supply chain, we are building a strong community within and outside our organization. This strong linkage between Diebold Nixdorf Canada and our partners creates a chain reaction of sustainable action.

#### **Procurement practices in Supply Chain**

In direct procurement (suppliers that deliver components for our products to our parent company's manufacturing locations), there are further evaluations in place. Annually we carry 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. We are also requiring suppliers which we perceive to be in a higher risk category in respect of human rights and the environment to complete an enhanced due diligence questionnaire ("CORPORATE RESPONSIBILITY IN THE SUPPLY CHAIN" questionnaire). 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.

The specific policies can also be found on the Diebold Nixdorf website for suppliers, along with our global terms and conditions, <https://www.dieboldnixdorf.com/en-us/support/supplier-information>. Please see also our [ESG report](#).

#### **IV. Any measures taken to remediate any forced labour or child labour.**

Not applicable as no incidents to remediate.

#### **V. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.**

Not applicable as no incidents to remediate.

## **VI. Training**

As indicated before, all our employees and contingent workers are required to complete an online COBE training on joining and annually thereafter. This includes signing and agreeing to comply with our COBE.

In 2024 we also informed our employees worldwide about our supply chain responsibility activities via an article published on the DN intranet entitled 'How DN Strengthens Human Rights and Environmental Protection Worldwide'. Our aim is to ensure that all our employees, including those who do not work directly with our suppliers, are aware of our supply chain responsibility processes so that they can react appropriately if necessary.

We also required our DN global procurement team to undertake targeted training in 2024. Procurement approval is required for all new suppliers and the training seeks to ensure that they are equipped to spot any potential human rights or environmental concerns when onboarding a new supplier.

At our supplier event, which was attended by both direct and indirect suppliers, we delivered training on our expectations regarding human rights and environmental matters.

## **VII. How the entity assesses its effectiveness in ensuring that forced and child labor are not being used in its business and supply chains.**

The responsible corporate functions carry out regular reviews of the implemented preventive and remedial measures to ensure their effectiveness. To monitor the implementation of our processes for human rights and environmental protection, we primarily use our company's internal control system in addition to business-related tools and utilize our audit function for specific risk areas. The knowledge gained is taken into account in the further development of the relevant procedures where necessary. Incident investigations may also provide relevant information for these purposes.

Furthermore, we have an audit program for our key suppliers. Typically, these are carried out by our parent company Diebold Nixdorf Inc. people and are scheduled with the supplier. Twenty six audits were undertaken in 2024. 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.

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.

**Attestation:**

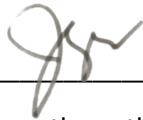
"In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above."

Full name: Jeannette Pacoli

Title: Director

Date: May 12, 2025

Signature, \_\_\_\_\_

A handwritten signature in dark ink, appearing to be 'JP' or similar, written over a horizontal line.

"I have the authority to bind 'Name of Entity.'"