

## Global Human Rights Policy

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### Table of Contents

1	PURPOSE .....	1
2	SCOPE .....	1
3	GOVERNANCE .....	2
4	ADDRESSING HUMAN RIGHTS IMPACTS .....	2
5	EMPOWERING WOMEN .....	3
6	PROTECTING MINORITY GROUPS' RIGHTS.....	3
7	PROVIDING A SAFE WORK ENVIRONMENT .....	3
8	COMPANY BASED REMEDIES .....	3
9	RELATED DOCUMENTS / REFERENCES .....	4
10	HISTORY.....	4

## 1 PURPOSE

The Diebold Nixdorf “Global Human Rights” Policy (the “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). This policy is one component of Diebold Nixdorf’s responsible and sustainable business practices in its own operations and throughout its supply chain and value chain.

The Policy provides a framework for the identification and assessment of human rights risks, the mitigation and management of risks, and the reporting and remediation of grievances if they occur in Diebold Nixdorf’s operations and throughout its supply chain. The purpose of the Policy is for Diebold Nixdorf to support the growth of human rights initiatives globally through its own actions.

## 2 SCOPE

This Policy applies to all directors, officers, and employees (collectively “Employees”) of Diebold Nixdorf, Incorporated and its worldwide subsidiaries and affiliates, its partners, vendors, suppliers, and contractors (“Diebold Nixdorf” or “the Organization”), as modified as required due to local law.

Diebold Nixdorf’s **Code of Business Ethics** instructs its Employees, business partners and contractors to conduct operations with honesty and integrity with a commitment to respecting the human rights of everyone with whom Diebold Nixdorf comes into contact with through its business and in the communities in which it operates.

Our commitment is based upon the fundamental rights and standards of treatment recognized by the majority of businesses, governments and individuals in the world as set forth in the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic,

Social, and Cultural Rights (ICESCR), the OECD Guidelines for Multinational Enterprises, and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. In addition, the UN Guiding Principles on Business and Human Rights (UN Guiding Principles) sets forth, among other things, a company's responsibility to respect human rights and a company's joint responsibility with governments to correct and remedy adverse human rights impacts when they occur. In accordance with UN Guiding Principles, Diebold Nixdorf is establishing these frameworks which are appropriate to the company's size, its business, operational impacts, and its circumstances.

Diebold Nixdorf will follow the higher standard where Diebold Nixdorf internal policies such as its **Conflict Minerals Policy** and **Anti-Modern Slavery Policy**, national law and international human rights standards are different. Where national law international standards are in conflict, Diebold Nixdorf will comply with national law while seeking to respect international human rights by investigating other actions which Diebold Nixdorf can take to provide the greatest protections.

Diebold Nixdorf will evaluate periodically its internal policies and processes to ensure promotion of these commitments and will regularly engage with stakeholders to further these commitments.

### 3 GOVERNANCE

Diebold Nixdorf's compliance and work in the area of human rights is overseen by the Diebold Nixdorf Chief Executive Officer, supported by the Diebold Nixdorf Executive Leadership Team including the heads of its Banking and Retail business segments, its Chief Legal Officer, its Chief People Officer and Senior Vice President of Business Strategy. Further support is provided by the Legal Operations Department, Labor Relations and Human Resources Department and the Environmental, Health and Safety Department, and the Operations Department. Board-level oversight is provided by the Governance Committee of Diebold Nixdorf.

### 4 ADDRESSING HUMAN RIGHTS IMPACTS

Diebold Nixdorf identifies and addresses any actual or potential adverse impacts with which it may be involved either directly or indirectly through its activities or its business relationships.

For example, Diebold Nixdorf suppliers play a critical role in sourcing responsibly and sustainably. Diebold Nixdorf will partner with its suppliers to drive toward the adoption of these human rights standards with all of its suppliers. Diebold Nixdorf currently directs its suppliers to abide by Diebold Nixdorf's policies which seek to protect human rights such as its policies on **Code of Business Ethics**, **Supplier Code of Conduct**, Use of **Conflict Minerals** and **Modern Slavery** and will provide assistance to its suppliers in complying with human rights directives.

In reviewing and remediating its own human rights impacts and that of its suppliers, Diebold Nixdorf will follow certain processes including:

- Verification - Diebold Nixdorf will perform due diligence on its operations and its suppliers' operations to confirm compliance with this Policy and related policies. When on-boarding new suppliers or entering new business partnerships and when operating in countries where there is a higher risk of human rights abuses, Diebold Nixdorf will perform additional due diligence to assess risks and address those risks.
- Training – Diebold Nixdorf will provide appropriate training to its employees and suppliers regarding this policy and its policies related to Human Rights.
- Auditing – Diebold Nixdorf will conduct periodic audits of its suppliers to evaluate compliance with this policy and related human rights policies.
- Tracking – Diebold Nixdorf will track and report on its audit findings to its stakeholders and will address with its stakeholders how impacts or negative audit findings are addressed.
- Communicating – Diebold Nixdorf will effectively communicate with its Employees, suppliers, contractors and external stakeholders affected by Diebold Nixdorf activities or operations regarding human rights issues.

If Diebold Nixdorf determines a supplier is not compliant with this policy or a related human rights policy, Diebold Nixdorf will engage with the supplier about remedying the non-compliance. If after a reasonable period, the supplier is unable or unwilling to be compliant with Diebold Nixdorf's policies, Diebold Nixdorf will discuss with the relevant stakeholders whether to end Diebold Nixdorf's relationship with the supplier.

## 5 EMPOWERING WOMEN

Diebold Nixdorf recognizes that globally, and to varying degrees, women face discrimination and disadvantage due to their gender. In some countries, women lack basic rights and the protection of laws as evidenced by high rates of poverty and violence against women. Women's rights and economic inclusion are priorities for Diebold Nixdorf.

Diebold is committed to protecting women in the workplace through its policies prohibiting discrimination and harassment and its adherence to local laws regarding discrimination and harassment.

Diebold Nixdorf is committed to providing the same employment opportunities, both in hiring and in advancement, to women as it does to men. Diebold Nixdorf not only respects the rights of women but affirmatively encourages company support for the increased role of women in the workplace and in society.

Diebold Nixdorf is committed to developing the skills and providing training and support to women at Diebold Nixdorf. Through various initiatives including Diebold Nixdorf's C.A.R.E. Council activities, training, and Diversity & Inclusion programming, Diebold Nixdorf has taken focused steps to increase the number of women in the workplace and to support women in its workplace and will continue to do so.

## 6 PROTECTING MINORITY GROUPS' RIGHTS

Diebold Nixdorf recognizes that certain groups may be at greater risk of negative human rights impacts due to their vulnerability or marginalization such as ethnic or racial minorities, the disabled and indigenous people. Diebold Nixdorf is committed to protecting all Employees and members of its supply chain and value chain from discrimination and harassment based upon these characteristics and others protected by the law and consistent with Diebold Nixdorf's global policy on **Diversity, Inclusion and Sensitivity** and its **Code of Business Ethics**.

Diebold Nixdorf encourages, through various initiative including Diebold Nixdorf's C.A.R.E. Council activities, training and Diversity & Inclusion programming respect and fair treatment of all people and encourages employees to engage in employee resource groups which promote diversity and inclusion and provide support for members of minority, marginalized or vulnerable groups.

## 7 PROVIDING A SAFE WORK ENVIRONMENT

To further its commitment to respecting human rights and promoting the dignity of the individual, Diebold Nixdorf, through various policies and processes, seeks to provide a safe working environment.

Diebold Nixdorf seeks to provide a diverse, inclusive workplace for its employees which allows its employees to perform their work to the best of their abilities, free from discrimination and harassment. Diebold Nixdorf seeks to provide equal opportunities for employment and advancement for everyone. Diebold Nixdorf, through its C.A.R.E. Council, encourages the formation of Employee Resource Groups and the active participation in those groups by its employees

Diebold Nixdorf seeks to provide a workplace free from business related injury or illness. Diebold Nixdorf complies with all health and safety laws and regulations and provides workplace safety training to its employees. Diebold Nixdorf tracks injuries occurring in the workplace and will change its processes to reduce the risk of injury to its employees as needed. Employees are encouraged to report any unsafe conditions which they observe and employees reporting such conditions are protected from retaliation.

## 8 COMPANY BASED REMEDIES

Diebold Nixdorf provides effective remedies through its company-based grievance mechanisms where human rights impacts occur. For example, grievance procedures are outlined in various countries for Employees, and Employees, suppliers and contractors are able to report issues through Diebold Nixdorf's EthicsPoint system which is available by telephone at 1-866-ETHICSP (1-866-384-4277) and online at <http://www.ethicspoint.com> or any applicable audit process.

Additionally, issues can be raised by Employees directly to supervisors, members of the company's [Legal, Compliance](#) and [Human Resources](#) departments. Diebold Nixdorf encourages its Employees, suppliers and contractors to contact Diebold Nixdorf about concerns which they have. Diebold Nixdorf does not tolerate retaliation or retribution against anyone for issues raised in compliance with its policies and **Code of Business Ethics**.

## 9 RELATED DOCUMENTS / REFERENCES

Title	Number
Code of Business Ethics	GPP10-01
Supplier Code of Conduct	GPP85-01
Conflict Minerals Policy	GPP85-10
Modern Slavery Policy	GPP85-11
Diversity, Inclusion and Sensitivity Policy	GPP60-11

## 10 HISTORY

Revision	Date	Comment	By
1	06/2021	Initial drafting	VP Labor & Employment