

Modern Slavery Act Statement and California Transparency in Supply Chain Act Statement

Introduction

Diebold Nixdorf is committed to conducting our business in an ethical and socially responsible manner. Modern slavery is not acceptable in our own operations or in those companies who work with us or on our behalf.

We recognize that modern slavery is a growing issue throughout the world and are continuing to take steps to maintain and monitor our operations and supply chain to ensure they are free from slavery; human trafficking; servitude and forced or compulsory labor.



Our Business

Diebold Nixdorf, Incorporated (NYSE: DBD) (Diebold Nixdorf) is a world leader in enabling connected commerce. We automate, digitize and transform the way people bank and shop. As a partner to the majority of the world's top 100 financial institutions and top 25 global retailers, our integrated solutions connect digital and physical channels conveniently, securely and efficiently for millions of consumers each day. We have a presence in more than 100 countries with approximately 22,000 employees worldwide.

Diebold Nixdorf, Incorporated is listed on the New York Stock Exchange. In the U.K. we operate through our trading subsidiary, Diebold Nixdorf (U.K.) Ltd. The boards of both Diebold Nixdorf, Incorporated and Diebold Nixdorf (U.K.) Ltd. have signed this statement. Our financial year ends on 31 December.



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.

Our Modern Slavery Policy specifically prohibits any form of 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.

In 2021 we introduced a [Global Human Rights policy](#) which 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).

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 of our officers, directors, employees and contingent workers are required to follow these policies. Our suppliers are required to adhere to our Code of Business Ethics and also our [Supplier Code of Conduct](#), which prohibits any form of modern slavery.

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.

Our policies are reviewed annually to make sure that they are in line with best practice and applicable laws and regulations.

Training

All our employees and contingent workers are required to complete an online Code of Business Ethics training on joining and annually thereafter. This includes signing and agreeing to comply with our Code of Business Ethics policy.

In 2021, we included a module on modern slavery as part of our Code of Business Ethics training. We also rolled out more focused training on modern slavery to Diebold Nixdorf people in our procurement and supply chain so they know how to spot the signs of forced labor and know where to go to report concerns.

Risk Assessment and Due Diligence

We want to make sure modern slavery is not taking place either in our own business or in our supply chain. We consider that the risk of modern slavery within our own operations is low as most of our people are highly skilled, and we have standardized global recruitment policies that we monitor carefully. We believe the risk of modern slavery in our supply chain is also low, but, obviously, the risks of modern slavery may be higher within our supply chain because DN does not directly control those operations.

Diebold Nixdorf manufactures banking and retail hardware such as ATMs and retail sales hardware such as POS (Point of Sale) terminals at our own facilities in the U.S., Germany and Brazil and at our joint venture facilities in China. We use global supply chain resources to provide raw materials and components.

In our own facilities, we adhere to all international and local labor standards, and we work with our joint venture partners to ensure they do the same.

We have used several risk factors to assess the modern slavery risk for our direct suppliers who contract directly with us. These include the country that our supplier is based in; the type of product or service supplied; and the workers' skill levels. This enables us to focus our due diligence activities on the areas of higher risk.

Supply Chain Due Diligence

Since 2017, all of our potential new suppliers have been set up and screened in our Compliance Desktop tool before being accepted as a supplier. As part of that screening process, the supplier must answer questions about the use of forced labor in its operations. If the supplier responds in a way that alerts us to a potential risk, then enhanced due diligence would take place.

We have an audit program for our key suppliers. Typically, these are carried out by Diebold Nixdorf people and are scheduled with the supplier. Due to the COVID pandemic, we were unable to carry out physical audits in 2021. We hope to resume physical audit activities at some point in 2022. This year, based on our risk assessment, where we consider a supplier to be in a higher risk category from a modern slavery 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.

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 will continue in 2021.

Diebold Nixdorf People

Diebold Nixdorf has approximately 22,000 employees. In 2020, we set up a CARE Council. CARE stands for Considerate, Aware, Responsible and Empathetic. Our CARE Council works cross-functionally through employees around the globe to support DN's clearly stated, measurable goals to increase diversity, inclusion, equity and respect in the workplace.

In 2021, we set up employee resource groups (ERGs) as part of the CARE Council. These are voluntary, self-sustaining, employee-led groups that bring members together based on shared characteristics, social identity or life experiences. They promote a diverse, inclusive workplace aligned with our Diversity and Inclusion (D&I) goals.

We have global recruitment processes to ensure that hiring is performed to company requirements including our commitment to labor and human rights standards. Our processes are set out in our Global Talent Acquisition Policy, and all hiring and terms and conditions offered to future employees are overseen by a Diebold Nixdorf talent acquisition partner. Likewise, all compensation and benefits offered to Diebold Nixdorf employees are overseen by our Compensation and Benefits professionals.

Governance

Our program to mitigate the risk of modern slavery occurring within our business or with our end-to-end supply chain is sponsored and fully supported by our Board of Directors.

In 2021, introduced a Global Sustainability Council made up of senior managers across functions, including our Environmental, Health & Safety team; Ethics & Compliance; Human Resources; Procurement; Manufacturing and R&D; Real Estate and Operations; Finance; Sales Operations; Internal Audit; and Legal. This council monitors our progress to ensure we manage risk appropriately and ensure a zero tolerance for modern slavery and all associated risks and consequences throughout our business and downward supply chain. It develops KPIs to track progress.

Reporting

We have a [whistleblowing hotline](#) where Diebold Nixdorf people and third parties outside the company can raise any ethical concerns, including any concerns about modern slavery. If a concern is raised, it would be investigated fully by our dedicated ethics and compliance professionals and our regional Ethics Committees would oversee and ultimately decide on any action required.

We also have a non-retaliation policy so that when our people raise a concern in good faith, they know, even if the concern ends up not being well – founded, that they will not be retaliated against.

This is our statement for our financial year ending 31 December 2021. Diebold Nixdorf is committed to being a responsible business and to respecting human rights. We are against all forms of modern slavery everywhere.

We welcome feedback at compliance@dieboldnixdorf.com

The boards of directors for the following companies have approved this Statement.

Diebold Nixdorf, Incorporated

Diebold Nixdorf (UK) Limited