California Transparency in Supply Chain Act & UK Modern Slavery Act Disclosure Statement 2019

Diebold Nixdorf is committed to conducting our business in an ethical and socially responsible manner. We recognize that modern slavery is a growing issue throughout the world and take steps to maintain and monitor our operations to identify and eliminate slavery and human trafficking in our products and supply chain. Diebold Nixdorf's Modern Slavery Policy specifically prohibits and 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. We are also aware of, and seek to avoid, the risks associated with certain vulnerable populations such as international employees, contractors, and interns.

In addition to our Modern Slavery Policy, our Code of Business Ethics demonstrates our commitment to international labor and human rights standards and—to the extent allowed by law—requires all officers, directors, and employees to report violations of all laws and regulations regarding Modern Slavery. To encourage honest reporting, our whistleblower policy strictly prohibits and form of retaliation against those who report in good faith. All of our suppliers are required to adhere to our Supplier Code of Conduct, which prohibits any form of Modern Slavery.

We have in place a Conflict Minerals and Modern Slavery Steering Committee, which continues to assess risks and identify methods to prevent human rights abuses relevant to Diebold Nixdorf's risk profile. The Steering Committee evaluates the modern slavery questions our suppliers are required to answer during the onboarding process; discusses and implements new training methods to inform employees about how to recognize signs of modern slavery—including online training and corporate communications; and sends letters to our key direct supply chain suppliers reaffirming our commitment to an ethical business model and reminding our suppliers of their obligations to avoid and report and modern slavery violations.



