

PROCEDURE FOR COMPLAINTS UNDER GERMAN SUPPLY CHAIN ACT

Number:	GPP10-39	Scope:	Global
Owner:	Chief Ethics and Compliance Officer	Owner Organization:	Legal Operations
Original Effective:	11/02/2023	Last Updated:	N/A
Security Classification:	Public	Category:	Ethics and Compliance

1 PURPOSE

Our standardized complaint and reporting procedure.

2 FORWARD

As of January 1, 2023, the German Supply Chain Due Diligence Act (LkSG) requires Diebold Nixdorf (DN) to undertake certain due diligence in our own operations and our supply chain in connection with human rights and environmental issues.

We are setting out here the procedures which we will follow where concerns are raised to us about human rights and the environment in our own business or the business of one of our suppliers.

All complaints will be handled in a fair and transparent manner.

The complaint procedure is described below.

3 REQUIREMENTS

3.1 Submitting Complaints and Reports

The complaint and reporting procedure is open to all Diebold Nixdorf employees and any third party.

3.2 Content of the Report and Complaint

Any suspicion of a violation of laws or our DN policies including those relating to human rights and environmental risks or obligations can be raised to DN. The suspicion can be directed at individual Diebold Nixdorf employees, a Diebold Nixdorf business, or a Diebold Nixdorf supplier.

3.3 Options for Submitting Complaints or Reports

Diebold Nixdorf has various reporting channels for complaints or reports.

Complaints and reports can be submitted via the EthicsPoint® Hotline 24 hours a day, 7 days a week. They can be in writing or by phone – and you don't even have to give your name if you don't want to.

The [EthicsPoint®](#) tool is available in many different languages and is managed by an independent operator. The content of the complaints or reports is however investigated by Diebold Nixdorf.

If you prefer to contact someone directly at Diebold Nixdorf, feel free to speak to any one of our Compliance Officers or contact compliance@dieboldnixdorf.com. You can also contact other Legal and Compliance personnel, company managers, the Human Resources personnel, or the Diebold Nixdorf Chief Compliance Officer.

3.4 Handling of the complaint or report received

Complaints are investigated by our regional Ethics Committees which include senior members of the Compliance teams, Internal Audit teams, our VP of Labour Law and our VP HR. Members of the Ethics Committees are subject

to a special duty of confidentiality, are impartial, and have the necessary expertise to professionally handle complaints and reports.

The company may contact you if additional information is needed, and in some instances the German Supply Chain Due Diligence Act (LKSG) may require us to discuss your complaint with you. Of course, this only works if we can contact you.

All complaints and reports may be submitted anonymously unless forbidden by local laws. Diebold Nixdorf takes great care to protect you as a reporter if you seek confidentiality and will ensure your complaint or report is kept confidential so far as possible. Under certain circumstances, however, Diebold Nixdorf may not be able to maintain confidentiality and will let you know.

Confidential data may only be disclosed on an as-needed basis as permitted by law. These principles apply regardless of the reporting channel.

Within seven days of receipt of your complaint or report, you will receive an acknowledgement from Diebold Nixdorf.

We take all complaints and reports seriously. Our Ethics Committee examines each complaint and report to clarify whether there is sufficient information to process the matter. We may request additional information from you.

Insofar as it is possible and legally permissible, **we will inform you within three months** of the measures taken – even if the fact-finding has not been completed by then.

3.5 We Protect Whistleblowers!

People who report in good faith will be fully protected. If you believe you or anyone else has been retaliated against or in any way has been treated differently for submitting a complaint or report, you should inform our company immediately through any of its reporting channels.

We follow up on all plausible allegations of retaliation or mistreatment. Severe measures will be imposed in response to substantiated act of retaliation.

4 CONTACTS

If you have any questions regarding this Policy, please contact [Ethics & Compliance](#).

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 (1-866-384-4277) and online at <http://www.ethicspoint.com>.

5 HISTORY

Revision	Date	Comment	By
1	11/2023	Original version	Diebold Nixdorf Human Rights Committee