



Achieving our Goals the Right Way

CODE OF BUSINESS ETHICS



ACHIEVING OUR GOALS THE RIGHT WAY

This Code of Business Ethics provides an overview to our employees, suppliers and business partners about our commitment to doing the right thing. Here at Diebold Nixdorf, we expect everyone to:

- Exercise sound judgment;
- Avoid questionable conduct;
- Ask questions when unsure how to handle a situation;
- Lead by example and teach others to do the same;
- Follow all Diebold Nixdorf policies and procedures;
- Report misconduct to managers, the compliance team and/or our confidential reporting hotline (Ethics Point);
- Never retaliate against anyone for raising ethical concerns; and
- Cooperate with any reviews by the Company.



Gerrard Schmid
Chief Executive Officer



Jonathan Leiken
Chief Legal Officer and
General Counsel



Elizabeth (Lisa) Radigan
Vice President,
Chief Ethics and Compliance Officer

KEY POINTS ABOUT OUR CODE

When and to whom does the Code of Business Ethics apply?

- Our Code of Business Ethics (the “Code”) applies to Diebold Nixdorf, Incorporated, to all of our subsidiaries and affiliates, and to all of our activities (collectively “Diebold Nixdorf” or the “Company”).
- This Code requires compliance with all applicable laws. Although the Code highlights numerous specific requirements, it is impossible to predict all scenarios that you may encounter. If you are ever unsure of the appropriate course of conduct, please contact the Legal or Ethics & Compliance teams or one of our Diebold Nixdorf resources identified at the end of this Code
- Our Code applies to all of Diebold Nixdorf’s directors, officers, employees, agents, contingent workers and contractors and we refer to all of them as “employees” in this Code. In addition, we expect our suppliers, distributors, customers and other business partners to act ethically and in a manner consistent with our Code.
- Any waiver of this Code may be made only by the Company board or a board committee.

Potential Wrongdoing Must Be Reported

- Any employee who is aware of a violation – or even suspects a violation – of this Code, other Diebold Nixdorf policies or the law must report it. Failing to report potential wrongdoing (or reporting a violation in bad faith) is itself a breach of this Code and may be cause for disciplinary action, up to and including termination of employment or service.
- The Company will fully support employees who make honest, good-faith reports and no one at Diebold Nixdorf may retaliate against an employee who follows this rule. Retaliation is itself a breach of this Code and cause for disciplinary action, up to and including termination of employment or service.

Investigation of Suspected Violations

- The Company will fully investigate any suspected violations and all employees are expected to cooperate and to provide complete and truthful information in connection with any investigation.
- If the investigation reveals that an employee acted inconsistently with the Code, other policies, or the law, the employee will be disciplined appropriately, up to and including termination of employment or service and – where warranted – potential legal action.

KEY AREAS OF FOCUS

The remainder of this Code is dedicated to specific areas of focus, each of which is summarized in this document and defined in greater detail in our core policies. The areas of focus are:

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OUR BUSINESS PARTNERS

We value collaboration and engage in proper transactions with business partners around the world.

- We only work with suppliers, business partners and other third parties who operate ethically.
- All suppliers and business partners are expected to exhibit high ethical standards and to support sustainable business practices and respect human rights.
- All third parties acting on our behalf to sell or market our products or interact with government entities on our behalf must act in line with our Diebold Nixdorf policies and are screened and monitored to ensure compliance with all applicable laws and regulations.

Working with Government

- Many governments have enacted unique laws, rules and regulations governing how organizations conduct business with them. It is Diebold Nixdorf's policy to comply with these requirements and to strictly adhere to all terms and conditions of any government contract.
- All employees who interact in any way with the U.S. government are expected to review and follow our Code of Conduct for U.S. Government Sales.
- It is not acceptable for any Diebold Nixdorf employee, supplier or business partner to engage in any form of tax evasion or fraudulently evading tax laws by a deliberate act or omission with dishonest intent.

ANTI-CORRUPTION

We do not permit or tolerate any improper payments of any kind.

- We adhere to all provisions of the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and other applicable anti-corruption laws where we do business.
- It is never acceptable to give, receive or offer a bribe – and it is never acceptable for a third party to do so on our behalf. Bribes are not limited to cash payments and can include anything of value, such as travel, entertainment, promotional or demonstrative items, the promise of a job or even a gift.
- Employees, business partners, suppliers and any other third party operating on our behalf may not, directly or indirectly, offer, provide, promise or accept anything of value in exchange for favorable business treatment or to obtain or retain business.
- All gifts, entertainment, travel and marketing or training events must conform to our policies, must be clearly for legitimate business purposes, must be modest and infrequent and must be transparent.
- All charitable donations or sponsorships must be approved and may be prohibited, in accordance with our policies, and shall not be used as a pretext to make an improper or unauthorized payment. Political donations made on behalf of the Company are strictly prohibited.
- We must also comply with all applicable anti-money laundering laws. Immediately report to your manager, your Legal team or your Compliance team any unusual or suspicious activities or transactions, such as:
 - Attempted payment in cash or from an unusual financing source;
 - Arrangements that involve the transfer of funds to or from countries or entities unrelated to the transaction or customer;
 - Unusually complex deals that don't reflect a real business purpose; or attempts to evade record-keeping or reporting requirements.

GLOBAL TRADE, IMPORT, EXPORT

We diligently follow international trade laws.

- Employees and business partners involved in cross-border business are expected to comply with all trade sanctions and embargoes imposed by the United States or any other jurisdiction in which we do business.
- Employees and business partners are also expected to properly document all products, materials and technology imported or exported to ensure compliance with customs and import/export laws and regulations.

FINANCIAL DATA

We carefully prepare our business and financial results.

- Diebold Nixdorf maintains disclosure controls and procedures to ensure full, fair, accurate, timely and understandable disclosure of required information.
- Employees must create complete, accurate and truthful records.
- We are dedicated to, and expect our employees to adhere to, reliable financial reporting controls in accordance with U.S. generally accepted accounting principles.
- Our financial statements and books and records must properly disclose the nature and purpose of transactions and employees are expected to comply with all laws, regulations and Diebold Nixdorf policies regarding proper disclosure and recordkeeping.
- All employees, suppliers and business partners are expected to fully cooperate with all internal and external auditors.



DATA PRIVACY

We safeguard personal information.

- Diebold Nixdorf is committed to complying with all laws governing the collection, use, and processing of personal information.
- It is Diebold Nixdorf's policy to collect personal information only by lawful means and to maintain such information only for legitimate business, legal, or contractual reasons. Employees should only store personal information for as long as is required.
- Employees may only access, collect, use, and disclose the minimum amount of personal information necessary to achieve a legitimate purpose and may only do so if they are authorized to handle the personal information.
- Employees who are authorized to access, collect and use personal information may only disclose personal information to authorized persons or third parties who have a legitimate business reason to know the information and who are obligated to protect it.
- Where notices or consents about intended use of personal information are required, employees must consult with the data privacy team to ensure notices are appropriate.
- Where privacy laws restrict the transfer of personal information across borders, employees must evaluate those projects with the data privacy team.
- Diebold Nixdorf requires third parties to protect personal information provided to them by Diebold Nixdorf and only use the personal information for authorized purposes.



INFORMATION AND CYBER SECURITY

We protect our confidential information, electronic devices and systems.

- We protect confidential information for example business plans, product developments, pricing strategies or information that a customer may have given us. We classify the information in line with our policies and handle it according to the classification.
- Employees are expected to protect the security of our computers and systems by using strong passwords, taking steps to protect Diebold Nixdorf equipment to avoid theft or damage, reporting suspicious emails, and not clicking on links that seem suspicious.
- Employees who suspect a security related incident or data breach or become aware of a situation where data may have been compromised, must immediately report it to the Information Security and Privacy teams.
- Employees may only use Diebold Nixdorf computers, systems, and equipment for business purposes and our employees are expected to exercise good judgment in their communications within the Company and when communicating with outside parties.

CONFIDENTIALITY

We protect confidential Organization information.

- Employees, suppliers and business partners must keep all information learned from Diebold Nixdorf strictly confidential including the confidential information of our customers.
- Employees may not provide information to investors, the media or industry analysts without express approval from the Diebold Nixdorf Disclosure Committee.
- While we encourage our employees to invest in Diebold Nixdorf securities, employees are strictly prohibited from using confidential information to trade in Diebold Nixdorf securities and are prohibited from sharing such information with others for the purpose of trading in Diebold Nixdorf securities. Employees must adhere to all trading limitations and blackout windows as detailed in our Trading Policy.
- Employees, suppliers and business partners must exercise caution and good judgment in using social media and may not share confidential information on such platforms without express approval.

WORK ENVIRONMENT

We maintain a respectful work environment.

- Every employee is responsible for assuring that the workplace is free from inappropriate conduct and harassment. Any form of bullying or any harassment including sexual harassment is not tolerated at Diebold Nixdorf.
- We value diversity. We are committed to equal employment in hiring, equal pay for equal work, and equal advancement opportunity without regard to sex, race, color, religion, national origin, disability, sexual orientation, veteran status and any other classification protected by applicable law. We expect our business partners and suppliers to demonstrate this same commitment.
- Diebold Nixdorf strives to be a fair and inclusive place where every employee feels valued and able to make their own contribution without improper interference from others.

HUMAN RIGHTS

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 U.N. Guiding Principles on Business and Human Rights. 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 who work with or for us. Modern slavery includes human trafficking, slavery, servitude and forced or compulsory labor. Every year we report on the steps we take to make sure there's no modern slavery in our own business or supply chains.

FAIR COMPETITION

We vigorously compete for all business.

- We win customers based on our products or services and do not disparage our competitors or solicit or use non-public information from our competitors.
- We comply with all relevant antitrust and fair competition laws in all jurisdictions in which we do business.
- We never agree with competitors to set prices, limit production, divide markets or bids or make any other agreements to limit competition. As a rule of thumb, we do not discuss prices, clients, product plans or other confidential information with any competitors.
- Employees working with distributors and other business partners must ensure that contracts with such distributors are reviewed and approved by the legal department to ensure compliance with fair competition laws.

CONFLICTS OF INTEREST

We avoid conflicts of interest.

- All employees and members of their immediate families are expected to avoid situations that cast doubt as to whether or not the employee is acting in the best interests of the Company.
- Employees, suppliers and business partners are expected to be transparent and promptly disclose any potential conflicts of interest to the legal and compliance department.
- Employees and directors may not use Diebold Nixdorf property for opportunities for personal gain and may not compete with the Company.

INTELLECTUAL PROPERTY

We protect our ideas.

- All employees, suppliers and business partners are expected to take care to protect and keep confidential Diebold Nixdorf's inventions, patents, trademarks, copyrights and trade secrets.
- Employees involved in software development must pay particular attention to intellectual property rules and regulations and should consult with the legal department if they have any questions or concerns.
- Employees, suppliers and business partners must also respect the intellectual property rights of others. We only use licensed software and do not download photos, movies, music or other protected works without proper authorization.

DIEBOLD NIXDORF PROPERTY

Our property is only used for Company purposes.

- All employees are responsible for protecting Diebold Nixdorf's physical assets and Company funds and ensuring their proper use.
- Our assets may never be used for any unauthorized purpose.
- Employees, suppliers and business partners are expected to be alert to potential fraud or misuse of Diebold Nixdorf assets – including misuse of credit cards and petty cash, filing false expense reports or mischaracterizing transactions.

CUSTOMER INTERACTION

We treat customers fairly and with respect.

- Employees must maintain customer confidence and safeguard all customer data and information.
- Employees, suppliers and business partners are not permitted to share customer information outside of Diebold Nixdorf and may only access customer information as needed for legitimate business purposes and only as permitted by law.
- Employees must contact the legal department or global risk and security before collecting, transferring, processing, disclosing or disposing of customer data.

SUSTAINABILITY

We are committed to sustainable development and protecting the environment.

- We are committed to sustainable business practices and actively work to reduce our carbon emissions and minimize our impact on the environment.
- Employees are expected to adhere to our guiding Sustainability Principles outlined in our Global Sustainability Policy. We conduct company operations in ways that protect the environment by reducing waste, preventing pollution, promoting recycling, and conserving resources. We are committed to compliance with all applicable environmental laws.

HEALTH AND SAFETY

We are committed to a safe working environment.

- We strive for a workplace where no accidents occur, and no employees are injured. We train our employees on safety related topics regularly and discuss safety measures at regular team meetings or during required Health and Safety Committee meetings.
 - We continually review work processes and health and safety metrics to determine whether to modify work processes to minimize the chance of an injury to employees or the community in which we work.
 - Employees are expected to report any unsafe conditions which they observe and employees who report such conditions will not be retaliated against.
 - Where an employee is injured in the course and scope of employment, we provide all required benefits and treatment under applicable law and workers' compensation programs with the goal of having the employee return to work as soon as the employee has recovered from any work-related injury.
- We are committed to compliance with all applicable health and safety laws.

OUR DIEBOLD NIXDORF RESOURCES

We expect our employees, suppliers and business partners to report misconduct and wrongdoing and to reach out with questions.

There are numerous Company resources available to help answer questions, make the right decision and report concerns:

- Supervisors or managers
- Human Resources partners or representatives
- Chief Ethics & Compliance Officer or any member of the global Ethics & Compliance team (compliance@dieboldnixdorf.com)
- Diebold Nixdorf's Chief Legal Officer or any member of the global Legal team
- Diebold Nixdorf's Board of Directors
- The confidential Ethics Point hotline

ETHICS POINT

Employees may report matters to Diebold Nixdorf's confidential Ethics Point hotline available at: 1-866-ETHICSP (1-866-384-4277) or www.ethicspoint.com

ARGENTINA
0-800-555-0906

AUSTRALIA
1-800-339276

AUSTRIA
0800-291870

BAHAMAS
1-8005399827

BANGLADESH
157-0011 – At the prompt dial 866-384-4277

BELGIUM
0800-77004

BOLIVIA
800-10-0707

BRAZIL
0800-8911667

BULGARIA
00-800-0010 – At the prompt dial 866-384-4277

CAMBODIA
1-800-881-001, available from payphones in Phnom Penh and Siem Riep only – At the prompt dial 866-384-4277

CAYMAN
1-8003371159

CHILE
1230-020-5771

CHINA
Southern – 10-800-120-1239
Northern – 10-800-712-1239

COLOMBIA
01800-9-155860

COSTA RICA
0800-0121386

CROATIA
0800-220-111 – At the prompt dial 866-384-4277

CURACAO
001-800-872-2881 – At the prompt dial 866-384-4277

CZECH REPUBLIC
800-142-550

DENMARK
80-8828



**DOMINICAN
REPUBLIC**
1-8887512292

ECUADOR
1-800-225-528
Andinatel:
1-999-119 – At the
prompt dial 866-384-4277

EGYPT
02-2510-0200
Cairo:
2510-0200 – At the
prompt dial 866-384-4277

EL SALVADOR

ESTONIA
800-12001 – At the
prompt dial 866-384-4277

FIJI
004-890-1001 – At the
prompt dial 866-384-4277

FINLAND
0800-1-14945

FRANCE
0800-902500

**FRENCH
ANTILLES**
0-800-99-0011 – At the
prompt dial 866-384-4277

FRENCH GUIANA
0800 99 00 11 – At the
prompt dial 866-384-4277

GERMANY
0800-1016582

GIBRALTAR
8800 – At the prompt
dial 866-384-4277

GREECE
00800-12-6576

GRENADA
1-800-225-5288, available
from airports, cruise docks
and hotels only – At the
prompt dial 866-384-4277

GUADELOUPE
0-800-99-0011 – At the
prompt dial 866-384-4277

GUAM

GUATEMALA
1-800-6240091

GUYANA
1-8007320752

HONDURAS
800-0123 – At the prompt
dial 866-384-4277

HONG KONG
800-964214

HUNGARY
06-800-17199

ICELAND
800-9208

INDIA
000-800-100-1071

INDONESIA
001-803-011-3570

IRELAND
1-800615403

ISRAEL
1-809-21-4405

ITALY
800-786907

IVORY COAST
00-111-11
French Operator:
00-111-12 – At the
prompt dial 866-384-4277

JAMAICA
1-8003371285

JAPAN
00531-121520

JORDAN
1-880-0000 – At the prompt
dial 866-384-4277

KAZAKHSTAN
8^800-121-4321 – At the
prompt dial 866-384-4277

KOREA (SOUTH)
00798-14-800-6599

LATVIA
8000-0937

LEBANON
01-426-801 – At the prompt
dial 866-384-4277

LUXEMBOURG
800-2-1157

MACEDONIA
0800-94288 – At the
prompt dial 866-384-4277

MALAYSIA
1-800-80-8641

MEXICO
001-800-840-7907

MICRONESIA
288 – At the prompt
dial 866-384-4277

MONACO
0800-91-1557

MOROCCO
002-11-0011 – At the
prompt dial 866-384-4277

NETHERLANDS
0800-0226174

**NETHERLANDS
ANTILLES**
001-800840-8061

NEW ZEALAND
0800-447737

NICARAGUA
001-800-220-1932

NORWAY
800-15654

PAKISTAN
00-800-01-001 – At the
prompt dial 866-384-4277

PANAMA
001-800-507-2386

PARAGUAY
008-11-800, Asuncion City
only – At the prompt dial
866-384-4277

PERU
0800-52116

PHILIPPINES
1-800-1-114-0165

POLAND
0-0-800-1211571

PORTUGAL
8008-12499

PUERTO RICO
1-866-384-4277

ROMANIA
0808-03-4288 – At the
prompt dial 866-384-4277

RUSSIA
8-10-8002-6053011

SAUDI ARABIA
1-800-10 – At the prompt
dial 866-384-4277

SENEGAL
800-103-072
French Operator
800-103-073 – At the
prompt dial 866-384-4277

SINGAPORE
800-1204201

SLOVAKIA
0800-001-544

SOUTH AFRICA
080-09-92604

SPAIN
900-991498

SRI LANKA
112-430-430
Colombo:
2-430-430 – At the prompt
dial 866-384-4277

SWEDEN
020-79-8729

SWITZERLAND
0800-562907

TAIWAN
00801-13-7956

THAILAND
001-800-12-0665204

**TRINIDAD AND
TOBAGO**
1-888-805-3405

TURKEY

UKRAINE
0^00-11 – At the prompt
dial 866-384-4277

**UNITED ARAB
EMIRATES**
8000-021

**U.S. MILITARY
BASES**
8000-051 or 8000-061 –
At the prompt dial
866-384-4277

UNITED KINGDOM
0800-032-8483

URUGUAY
000-413-598-3075

UZBEKISTAN
8^641-744-0010 – At the
prompt dial 866-384-4277

VENEZUELA
0800-1-00-4586

VIETNAM
120-11067



ADDITIONAL RESOURCES

You can learn more from Organization policies, which include, but are not limited to, the following:

- Anti-Corruption Policy
- Whistleblower Non-Retaliation Policy
- Anti-Corruption Corporate Development Policy
- Conflicts of Interest Policy
- Confidentiality & Disclosure Policy
- Fair Competition Policy
- Global Trade Compliance Policy
- Global Data Privacy Policy
- Global Environmental Health and Safety Policy
- Gifts, Entertainment & Travel Policy
- Information Security Policy
- Information Classification and Handling Policy
- Modern Slavery Policy
- Charitable Donations Policy
- Political Donations & Activities Policy
- Privacy Notice to Individuals
- Supplier Code of Conduct
- Third Party Policy
- Payee Policy
- Sales Intermediary Policy
- Trading Policy
- Global Sustainability Policy



[DieboldNixdorf.com](https://www.DieboldNixdorf.com)