

DIEBOLD  
NIXDORF

**SUPPLIER CODE  
OF CONDUCT**

DIEBOLD NIXDORF AND ITS WORLDWIDE AFFILIATES (“DIEBOLD NIXDORF”) ARE COMMITTED TO THE HIGHEST ETHICAL, SOCIAL AND ENVIRONMENTAL PRINCIPLES, CONSISTENT WITH DIEBOLD NIXDORF’S CODE OF BUSINESS ETHICS AND THIS SUPPLIER CODE OF CONDUCT (“CODE”). ALL SUPPLIERS OF DIEBOLD NIXDORF AND THEIR OWN SUPPLIERS (EACH A “SUPPLIER”) MUST SHARE THIS COMMITMENT.

Suppliers are expected to comply with all applicable laws, including applicable anti-corruption laws, around the world; promote diversity and good corporate citizenship; meet and exceed environment, health and safety standards; respect human rights; support a sustainable and transparent supply chain, including responsible mineral sourcing practices; and utilize management systems and processes necessary to enable compliance with this Code. Failure by Supplier to comply with this Code may jeopardize Supplier’s business relationship with Diebold Nixdorf, up to and including termination.

## LABOR & HUMAN RIGHTS

- Supplier must treat its employees, partners and workers with dignity and respect.
- Supplier must not engage in human trafficking, slavery, child labor or any other form of involuntary labor.
- Supplier must not allow or engage in unlawful discrimination or harassment in the workplace. Diebold Nixdorf does not tolerate conduct that might harass, disrupt or interfere with another person's ability to work.
- Supplier's employees, partners and workers must not possess, use, distribute or sell drugs on Diebold Nixdorf property or perform their work under the influence of alcohol or drugs.

## ENVIRONMENT, HEALTH & SAFETY

- Supplier must conduct operations with an objective of reducing waste, preventing pollution, promoting recycling and conserving resources.
- Supplier must provide safe and healthy working conditions to all employees, partners and workers, including emergency preparedness, industrial hygiene and machine safeguarding, among other things.
- Supplier must comply with all applicable environment, health and safety laws.

## CONFLICT MINERALS

- Conflict minerals are defined as columbite—tantalite (tantalum ore), cassiterite (tin ore), gold, wolframite (tungsten ore) or their derivatives (tantalum, tin, tungsten and gold).
- Diebold Nixdorf's objective is to eliminate conflict minerals from its supply chain that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country. Diebold Nixdorf expects Supplier to share this objective.
- Diebold Nixdorf conducts due diligence on its supply chain to enhance transparency and identify the country and smelter or refiner of origin of the conflict minerals that may be used in its products. Supplier must participate in Diebold Nixdorf's due diligence processes and provide complete and accurate information when requested. Supplier must perform similar due diligence on its own supply chain.

## ANTI-CORRUPTION

- Supplier is prohibited from directly or indirectly paying anything of value to any person, entity, government official, government agency or other third party in order to:
  - Obtain or retain business or to improperly influence any act or decision; or
  - Gain an improper business advantage.
- Supplier must avoid corrupt practices and follow all applicable anti-corruption laws, including, but not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA").
- Supplier must ensure that all invoices and other financial statements provided to Diebold Nixdorf are accurate and transparent; Supplier may not mischaracterize, falsify, attempt to hide or obscure, or otherwise disguise any transactions or requests for payment.

## CONFLICTS OF INTEREST

- A conflict of interest arises when personal interests or activities conflict with, or appear to conflict with, the best interests of Diebold Nixdorf or the Supplier as organizations.
- Supplier must disclose to Diebold Nixdorf any apparent or actual conflicts of interest regarding its relationship with Diebold Nixdorf. If Diebold Nixdorf management approves an apparent or actual conflict, the approval decision must be documented.

## GIFTS & ENTERTAINMENT

- On an infrequent basis, Diebold Nixdorf employees may accept token gifts, modest entertainment or other business courtesies, but only if there is a legitimate business purpose.
- The following situations do not have a legitimate business purpose and are expressly prohibited:
  - Giving a gift, entertainment or preferred treatment with the intention of trying to influence the decision-making objectivity of a Diebold Nixdorf employee, partner or worker;
  - Offering a gift, entertainment or preferred treatment while involved in a current purchasing or contracting decision process with Diebold Nixdorf (e.g., RFI, RFQ, RFP, RFS);
  - A gift in the form of cash, including gift cards or certificates;
  - Offering extravagant or lavish recreational outings, travel or lodging.
- Diebold Nixdorf employees are not permitted to solicit gifts, entertainment or other gratuities from Supplier.
- Supplier must not offer an opportunity to purchase products, services or a financial interest to any Diebold Nixdorf employee under terms not available to all Diebold Nixdorf employees.
- Suppliers may not provide gifts, entertainment or travel on behalf of Diebold Nixdorf in connection with obtaining or retaining business for Diebold Nixdorf.

## DATA PRIVACY

- Supplier must comply with applicable data privacy laws and regulations when processing personal information of anyone they do business with, including suppliers, customers, consumers and employees.
- In particular, Supplier must only process the minimum amount of personal data necessary to perform its obligations to Diebold Nixdorf and only for the purposes set out in its agreement with Diebold Nixdorf. Supplier must keep personal data confidential and secure at all times.

## ACCURACY OF BUSINESS RECORDS

- Supplier is required to maintain accurate books and records that reflect actual and legitimate transactions and payments. The creation of falsified, inaccurate, incomplete or misleading documents is strictly prohibited.
- All financial books and records must conform to generally accepted accounting principles.
- Records must be legible and transparent.

## COMPETITION, IP & CONFIDENTIAL INFORMATION

- Supplier must comply with all applicable laws regarding fair competition and antitrust.
- Exchanges of confidential information must be pursuant to a written and executed confidentiality agreement between Diebold Nixdorf and Supplier. Any exchange of confidential information must be for the limited purpose of fulfilling contractual performance requirements.
- Supplier must not share or disclose Diebold Nixdorf's intellectual property, confidential information or any other proprietary information that Supplier acquires with any third party (including information developed by Supplier and information relating to products, customers, pricing, costs, know how, strategies, programs, processes and practices).
- Supplier must not disclose material, non-public information or trade in Diebold Nixdorf securities based on material, non-public information.

## TRADE, IMPORT & EXPORT

- Supplier must comply with the letter and spirit of all applicable import, export, customs, sanctions, embargoes, boycott and other trade compliance laws.

## MANAGEMENT SYSTEMS

- Supplier must maintain management systems and processes necessary to enable compliance with applicable laws and all elements of this Code, including training, monitoring, record keeping and reporting.

## DIEBOLD NIXDORF RESOURCES

- Supplier may contact its Diebold Nixdorf sourcing manager, Diebold Nixdorf's ethics and compliance team ([compliance@dieboldnixdorf.com](mailto:compliance@dieboldnixdorf.com)) or the Diebold Nixdorf EthicsPoint hotline (<https://secure.ethicspoint.com/domain/media/en/gui/2013/index.html>) for guidance or to report a potential violation of this Code.

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THANK YOU.