

STATEMENT OF COMPLIANCE WITH THE MODERN SLAVERY ACT 2015/THE MODERN SLAVERY ACT 2018

CARDTRONICS LIMITED - SLAVERY AND HUMAN TRAFFICKING STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “**UK MSA**”) and section 14 of the Modern Slavery Act 2018 (the “**AU MSA**”).

It is published on behalf of Cardtronics Limited (formerly Cardtronics plc, “**Cardtronics**”) together with its applicable subsidiaries and affiliates (together, the “**Group**”).

The Group is committed to improving practices to combat slavery and human trafficking, and will not tolerate any such practices in its supply chain. Cardtronics takes steps to minimise the risk of the Group working with any organisation that engages in such practices. As policy is set globally by Cardtronics for the Group and the Group's members use the same policies and procurement processes, this statement covers the measures adopted by the Group as a whole.

CARDTRONICS' STRUCTURE AND OPERATIONS

The Group is a provider and operator of automated teller machines (ATMs). Cardtronics plc was acquired by NCR Corporation (“**NCR**”) in 2021. Cardtronics is the ultimate parent company of the Group (which are indirect, wholly owned subsidiaries of NCR Corporation) with its head offices based in England and Wales. Given the acquisition took place mid-year 2021, this statement is being made by Cardtronics. The Group has over 2,000 employees worldwide and operates across Europe, UK, USA, Canada, Mexico, Puerto Rico, South Africa, Australia and New Zealand. In Australia, Cardtronics operates through its wholly owned subsidiary Cardtronics Australasia Pty Ltd (“**Cardtronics Australasia**”).

NCR has a global annual turnover of approximately \$7.156 billion (USD)

CARDTRONICS' SUPPLY CHAINS

The Group has a diverse network of customers and suppliers across the globe and recognises that, while it is ultimately the Group's suppliers' responsibility to treat their own staff and suppliers in an ethical fashion, Cardtronics has a social responsibility and can play an active role in ensuring that the organisations it works with operate within the law and do not infringe the rights of others. As such, Cardtronics is committed to further developing its global modern slavery compliance program across all jurisdictions where it conducts business.

CARDTRONICS' POLICIES AND GOVERNANCE ON SLAVERY AND HUMAN TRAFFICKING

Cardtronics is committed to minimising the risk of modern slavery and/or human trafficking in its supply chain or in any part of its business. Cardtronics and NCR already have a Code of Business Conduct and Ethics (the “**Code**”) that places compliance with the legislation of any jurisdiction where Cardtronics operates at the heart of its business and all of its employees receive training in and agree to abide by the contents of the Code. Cardtronics also has a specific policy related to anti-slavery and anti-human trafficking (“**MSA Policy**”). In 2021, each employee in the Group has been provided training on the MSA Policy and is expected to commit to its compliance and immediately raise any concerns with their direct managers or through Cardtronics' confidential whistle-blowing procedure. The Code and the MSA Policy, taken together, reflect Cardtronics' commitment to acting ethically and with integrity in all its business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in its supply chain or business.

The Group's Legal teams, in collaboration with the Global Compliance team, develop Cardtronics' modern slavery response. Among other permitted methods of reporting, instances of modern slavery may be reported in accordance with Cardtronics' whistle-blower policy and procedure, which allows for anonymous reporting.

ASSESSMENT AND MITIGATION OF SLAVERY AND HUMAN TRAFFICKING RISKS

Due diligence processes

The Group's subsidiaries in the UK, Germany, Spain, Australia and New Zealand utilise standard terms and conditions where appropriate, appended to their purchase orders, which require suppliers to comply with all applicable modern slavery legislation and allow the applicable Group counterparty to immediately terminate the agreement if it transpires that the supplier is in breach of *inter alia* the UK MSA and the AU MSA. All new bespoke supplier agreements are required, at a minimum, to include assurance from suppliers that in performing their services they will comply with all applicable laws and contain audit rights for the Group to validate compliance on an ongoing basis. These contractual provisions are being reinforced with self-reporting obligations for regulated and/or licensed businesses and enhanced due diligence checks where the Group is on-boarding new customers and suppliers in the UK.

As part of this UK and Australian supplier approval process, the Group has introduced an enhanced vendor vetting checklist within the Group's UK and Australian subsidiaries, which asks potential suppliers to confirm specifically that they comply with the requirements of the UK MSA and the AU MSA. If any responses to the checklist questions raise any concerns, these are escalated to senior management and the legal team for review before the supplier is permitted to work with the Group.

Enhanced contractual protections for Cardtronics, emphasising the requirement for customers to abide by applicable laws, including the UK MSA and the AU MSA, have been introduced as standard contractual conditions in all of the Group's jurisdictions.

Governance and training

Cardtronics has long operated a safe and confidential whistle-blowing policy and process and actively encourages employees to use it if they become aware of any breach of any law or any Group policy. Cardtronics also has a robust internal audit process and works extensively with auditors both inside and outside the organisation to ensure that its businesses are operated in accordance with applicable laws and the Group's own policies and procedures.

In addition to the efforts being made in the UK and Australia described above, Cardtronics' board of directors reviews and updates its global supplier code of conduct ("**Supplier Code of Conduct**") annually and has reviewed the current version in the second quarter of 2021. The Supplier Code of Conduct outlines Cardtronics' desire to engage with suppliers that have a shared commitment to its ethical, legal and social business standards and values. Amongst other things, it will require Cardtronics' suppliers to not engage in any conduct that violates the human rights of others and address any adverse human rights impacts of their operations. The Supplier Code of Conduct is posted to the Cardtronics website and will be included in the vendor on-boarding materials used by global procurement. Enhanced training for the procurement and legal teams in each jurisdiction will be provided to allow the procurement and on-boarding teams to fully understand the Supplier Code of Conduct.

Cardtronics released an internal employee communication to ensure that all staff are familiar with the terms of the Code and agree to abide by it. Cardtronics provided further training to staff alongside the adoption of the Code of Conduct in 2021. This training emphasized recognizing and reporting suspected instances of compliance failures both inside the Group and within the Group's supply chains.

Cardtronics has undertaken a worldwide review of its compliance functions and capabilities and has undertaken extensive risk assessments on all areas of its activities and compliance generally. These risks assessments form the foundation of Cardtronics' compliance and education efforts and identify areas of focus for training and implementation.

ASSESSING EFFECTIVENESS

Cardtronics has implemented training on Modern Slavery and Human Trafficking for all employees to complete on an annual basis (the "training"). Cardtronics Australasia set a goal that 100% of employees would complete the training in 2021. This goal was achieved. Consequently, the awareness of the business has increased as a result of the training, which will help the business to identify issues and risks relating to modern slavery.

During 2020, Cardtronics Australasia collaborated with external advisors on the creation of a Modern Slavery Questionnaire to send to all vendors for better consideration of the modern slavery risks within the companies' supply chains. This Questionnaire was finalised during 2020 and it was sent out to all applicable Australian vendors in 2021. Responses from vendors were reviewed and tracked for completion and accuracy. The review of such responses did not reveal any instances of modern slavery in our supply chain.

It is our intention to conduct a review and consolidation of Cardtronics' Australasia modern slavery process with NCR's global process during 2022-2023.

CONSULTATION AND APPROVAL

This statement was prepared in consultation with the each of the Groups Legal and Compliance teams, as well as external advisors as needed. It was approved by the Board of the Group. Cardtronics Australasia has consulted with the relevant companies that it owns or controls in the development of this statement.

SIGNATURE:



This statement was approved by the Board of Cardtronics Limited on June 29, 2022 and is signed on its behalf by Paul Carbonelli, Director.