

Modern Slavery and Human Trafficking Statement

Introduction

Modern slavery, human trafficking, and other forms of exploitation remain pervasive global issues. Modern slavery can take many forms, including slavery, servitude, forced, coerced, or compulsory labor, child labor, and human trafficking. These practices all involve the deprivation of a person's liberty and the extreme exploitation of individuals for another's personal or commercial gain. When we use the term 'modern slavery' in this document, we refer to these practices.

As a multinational organization, we recognize our responsibility related to this issue and strive to combat these practices within our operations and supply chains across all countries in which we operate. This statement outlines our commitment towards working to prevent modern slavery and details the steps we are taking to address these issues. In doing so, we also strive to be in compliance with relevant legislation. Several jurisdictions around the world have enacted modern slavery laws and other guidance to combat forced labor, human trafficking, and other forms of exploitation. These laws and guidance include the following:

1. **United Kingdom:** The UK Modern Slavery Act 2015; The UK's Statutory Guidance: "Transparency in supply chains: a practical guide", published 27 March, 2025;
2. **Australia:** Section 14 of the Modern Slavery Act 2018;
3. **United States:** The U.S. Federal Acquisition Regulation's anti-human trafficking rule; California Transparency in Supply Chains Act of 2010;
4. **Canada:** The Fighting Against Forced Labour and Child Labour in Supply Chains Act.

Our Company

In mid-year 2021, NCR Corporation acquired Cardtronics Plc and its wholly owned subsidiaries ("**Cardtronics Group**"). In late 2023, NCR Corporation split into two independent, publicly traded companies – one focused on digital commerce and the other on automated teller machines ("**ATMs**"). NCR Atleos Corporation focuses on ATMs and is now the ultimate parent company of the Cardtronics Group. All references to NCR Atleos in this statement include the Cardtronics Group and all other subsidiaries and affiliates of NCR Atleos Corporation.

NCR Atleos' global headquarters are located in Atlanta, Georgia in the United States and NCR Atleos has a presence across the globe, including United States, Canada, United Kingdom, and Australia. NCR Atleos is a leading software and services-led enterprise provider in the banking and ATM industries.

NCR Atleos Corporation is governed by a Board comprised of 7 directors. The Nomination and Governance Committee has responsibility for Sustainability-related matters included in the committee charter. The Chief Risk Officer reports to the General Counsel and provides regular updates to the Nomination and Governance Committee. The Executive Director of Sustainability, Regulatory Compliance and Emerging Risk, who is responsible for the issuance of this disclosure, reports to the Chief Risk Officer. The Executive Director, Process and Compliance is responsible for supply chain matters (supplier onboarding, Supplier Code of Conduct communication and compliance, etc.) and reports to the Corporate Vice President of Supply Chain Management.

In 2025, NCR Atleos assembled ATMs at a wholly owned facility in Chennai, India and outsourced assembly of some ATMs to third party suppliers based in Budapest, Hungary and Chihuahua, Mexico. NCR Atleos sells, distributes and maintains ATMs, and their components in North America (including

Canada), Central America, South America, the European Union, Australia, and various countries in Africa and Asia.

NCR Atleos is a member of the ATM Association (ATMIA) and the American Bankers Association (ABA). As of December 31, 2025, NCR Atleos had approximately 20,000 employees globally.

Our Statement and Organizational Structure

This statement describes the steps that NCR Atleos has taken in an effort to address modern slavery in our organization and in our supply chain. As policy is set globally, all NCR Atleos subsidiaries and affiliates use the same policies and procurement processes. This statement covers the measures adopted by NCR Atleos as a whole and is published on behalf of NCR Atleos. It covers activities from January 1, 2025 through December 31, 2025 ("**Reporting Period**"). The statement is made for purposes of complying with applicable laws, including those mentioned above and is applicable to NCR Atleos and specifically the following subsidiary entities:

- Cardtronics Canada Holdings Inc. (incorporated in Canada);
- Cardtronics Canada, Ltd. (incorporated in Canada);
- Cardtronics Canada Operations Inc. (incorporated in Canada);
- Cardtronics Canada Limited Partnership (formed in Canada);
- Cardtronics Canada ATM Processing Partnership (formed in Canada);
- Cardtronics Canada ATM Management Partnership (formed in Canada);
- Cardtronics Australasia Pty Ltd (incorporated in Australia);
- Cardtronics Australia Pty Ltd (incorporated in Australia);
- Cardtronics ATM Pty Ltd (incorporated in Australia);
- Cardtronics Pty Ltd (incorporated in Australia);
- Cardtronics Holdings Australia Pty Ltd (incorporated in Australia);
- Cardtronics UK Limited (incorporated in England);
- NCR Financial Solutions Group Limited (incorporated in England);
- Sunwin Services Group (2010) Limited (incorporated in England);
- Perative Inc (incorporated in Canada)

In 2024, NCR Atleos consolidated the different statements that it has across the applicable jurisdictions to create a joint modern slavery statement, as evidenced by this statement for the Reporting Period.

NCR Atleos strives to conduct our business in a socially responsible manner and to operate in compliance with applicable laws and regulations. Such laws and regulations include those related to modern slavery within our organization and in our supply chain, and compliance is managed by NCR Atleos' global teams, with input from the United States, Canada, UK, Australia, and other jurisdictions in which NCR Atleos operates.

In furtherance of this commitment, NCR Atleos hereby certifies that NCR Atleos conducts due diligence and other compliance reviews of its supply chain partners to assess, among other things, whether any suppliers have engaged in the use of modern slavery or provided to NCR Atleos merchandise, wares, articles, products, inputs, or other solutions (collectively, "items") that are the result of modern slavery.

SUPPLY CHAIN, POLICIES, AND GOVERNANCE

Supply Chain

NCR Atleos manufactures hardware in its facility in India. To augment its production capabilities, the company has established a strategic manufacturing partnership with Ennoconn in Hungary. Both the internal facility and the partnership require manufacturing and non-manufacturing suppliers. NCR Atleos has a global supply chain, with over 8,000 suppliers providing raw materials, service parts, internally and externally used products, services, software, SaaS, labor, and transportation & logistics. There are inherent risks of modern slavery occurring in our supply chain given the manufacturing locations and types of manufacturing and non-manufacturing suppliers that are engaged by NCR Atleos. Certain materials used in the manufacturing of our products are known by the United States Bureau of International Labor Affairs to be at risk of containing child or forced labor. Some of these materials, such as aluminum and materials involved in touch screens, are used to manufacture our products. We have also identified the use of outsourced labor as a risk. The Company applies a risk-based approach to identifying, assessing, and managing potential modern slavery, forced labor, and human trafficking risks within its operations and supply chains, consistent with applicable modern slavery and supply chain transparency laws, including the California Transparency in Supply Chains Act, the UK Modern Slavery Act 2015, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and Australia's Modern Slavery Act 2018. When suppliers are onboarded, and at least annually thereafter, their Environmental, Social and Governance information in Dunn & Bradstreet is reviewed, if available. Suppliers are also vetted against the Global Disaster Index and the Corruption Perceptions Index (CPI), and our supplier agreements generally require our suppliers to comply with our Supplier Code of Conduct which prohibits the use of child and forced labor.

CPI scores are incorporated as one quantitative input within NCR Atleos' broader country risk screening methodology and are reviewed alongside other risk indicators, including sector-specific risk signals, labor rights considerations, commodity risk, and the geographic concentration of suppliers. Suppliers operating in countries with elevated CPI risk scores are subject to additional due diligence measures. The Company recognizes that CPI scores do not measure forced labor directly and therefore does not rely on the index in isolation. Rather, the CPI is used as a screening-level tool to inform risk prioritization and due diligence planning.

All suppliers are reassessed on an annual basis.

The Company conducts periodic internal reviews of supplier onboarding and supplier maintenance controls. Each year, at least one geographic region is selected for enhanced review based on identified risk factors and the Company's operational footprint. These reviews assess adherence to onboarding requirements, the completeness of supplier due diligence records, and the effectiveness of ongoing supplier monitoring processes.

Although we have not identified and are not aware of any specific issues in our supply chain, NCR Atleos is committed to improving practices to identify modern slavery and combatting such practices in its supply chain. NCR Atleos takes steps to minimize the risk of working with organizations that engage in such practices. The requirement to adhere to applicable law is mandatory to all subcontractors, suppliers, and agents with whom NCR Atleos engages.

Supply Chain Due Diligence and Policies

NCR Atleos expects that its suppliers will conduct business ethically and will comply with the law. NCR Atleos has adopted a Supplier Code of Conduct ("**Supplier Code of Conduct**"), which includes, among other things, a requirement to adhere to NCR Atleos' Human Rights Policy (updated in 2025), which prohibits modern slavery. It also represents NCR Atleos' desire to engage with suppliers that have a shared commitment to its ethical, legal, and social business standards and values.

Suppliers associated with higher risk commodities are subject to increased scrutiny. To further enhance this risk-based framework, NCR Atleos conducts third-party audits or spot checks for new and existing suppliers identified as higher risk based on geography, commodity, or other risk indicators.

As part of its supply chain due diligence processes, NCR Atleos also leverages available environmental, social, and governance (ESG) information from third-party data providers when onboarding suppliers and as part of periodic supplier reviews conducted at least biennially. Where available, ESG information from Dun & Bradstreet is reviewed to identify potential social and governance risk indicators relevant to modern slavery, forced labor or broader human rights risks. Dun & Bradstreet's ESG data draws on a broad range of verified public and proprietary sources and provides risk insights across multiple ESG themes, including labor practices and ethical conduct. This information is used as a screening and risk-prioritization tool, in conjunction with geographic risk indicators, commodity risk assessments, and internal data, to help determine whether enhanced due diligence may be warranted. Dow Jones data is also leveraged for continuous adverse media monitoring. ESG information and adverse media monitoring are not used as a standalone determination of modern slavery risk but rather as two inputs within NCR Atleos' broader risk-based supplier assessment framework.

NCR Atleos requires its suppliers to certify to NCR Atleos that they conduct business ethically and that they either will comply with NCR Atleos' Supplier Code of Conduct, or that they maintain a code of conduct that complies with applicable law and that contains provisions at least as restrictive as those in NCR Atleos' Supplier Code of Conduct, including the prohibition on modern slavery. In 2025, 100% of suppliers met this requirement.

NCR Atleos has continued steady improvement of its approach to identifying and managing modern slavery risks. In 2022-2023, NCR Atleos also improved its third-party risk management program which includes modern day slavery risks and continues to look at ways to further improve that program.

Specifically, as part of NCR Atleos' supplier approval process, NCR Atleos requires the completion of an onboarding questionnaire for new suppliers, which includes a modern slavery risk review ("**Onboarding Questionnaire**"). The Onboarding Questionnaire considers several factors to assess the potential risks of modern slavery in our supply chains. Only those Suppliers in compliance with NCR Atleos requirements are approved, onboarded and loaded as a supplier to NCR Atleos. The Onboarding Questionnaire was introduced for all new suppliers in 2022. Every new supplier onboarded in 2022 - 2025 was required to complete the Onboarding Questionnaire before being onboarded.

CORPORATE GOVERNANCE

Training

NCR Atleos maintains mandatory ethics and compliance training as a core element of its corporate governance framework. Each fiscal year, NCR Atleos requires all employees to complete a training and certification module on its Code of Conduct ("Training"). The Training covers, among other topics, NCR Atleos' Human Rights Policy and ethical supply chain expectations, emphasizing the importance of recognizing and reporting suspected compliance failures both within NCR Atleos and its supply chain. At the conclusion of the Training, employees are required to certify their compliance with the Code of Conduct and to disclose any concerns or exceptions for further review. In 2025, 100% of the Company's employees completed the annual Code of Conduct training, reinforcing consistent awareness of ethical standards across the organization.

NCR Atleos uses a third-party ethics and compliance training provider, NAVEX, to deliver its Code of Conduct training. NAVEX provides configurable and modular ethics and compliance training content that is legally vetted and designed using subject-matter expertise and scenario-based learning, including modules addressing human trafficking and modern slavery.

While NAVEX develops the training content, NCR Atleos determines which modules are deployed based on internal risk indicators and data trends, including information derived from its AlertLine whistleblower reporting mechanism. AlertLine data, which may include concerns raised by employees, suppliers, or other third parties, helps inform training focus areas and identify topics where additional awareness may be warranted.

To further strengthen prevention and awareness, NCR Atleos plans to introduce a dedicated modern slavery training module as part of its Code of Conduct training program in 2026. This module will be delivered to all employees and is intended to deepen understanding of modern slavery risks, warning signs, and reporting mechanisms.

Reporting

NCR Atleos employees, business partners and suppliers are encouraged to speak up and report any concerns of wrongdoing to any of the multiple avenues that NCR Atleos provides for employees to report their concerns. Employees can report concerns to their management teams, local human resources or legal departments, and a company-wide Ethics and Compliance Office. We also make available an alert line whereby employees, business partners and suppliers can report concerns anonymously. If employees do not feel comfortable reporting this information internally, they should contact the Global Human Trafficking Hotline at 1-844-888-FREE or via email help@befree.org. The NCR Atleos AlertLine at 1-844-539-2243 can also be utilized to raise concerns, and a reporting link is included in the NCR Atleos Supplier Code of Conduct. The NCR Atleos Whistleblower Policy, which can be found on our website in the Governance section, prohibits retaliation against individuals who make good faith reports of misconduct, including reports of potential violations of NCR Atleos policies or our commitment to fight modern slavery.

In accordance with its whistleblowing policy, NCR Atleos strives to operate a safe and confidential whistle-blowing process and actively encourages employees to use it if they become aware of or have concerns about any breach of law or NCR Atleos policy. NCR Atleos also has a robust internal audit process and works extensively with auditors both inside and outside the organization to ensure that its businesses are operated in accordance with applicable laws, best practices, and NCR Atleos' own policies and procedures. As part of its governance processes, NCR Atleos conducts quarterly trend analysis of concerns raised through the AlertLine to identify potential patterns or emerging risks. Where concerns are raised, these are escalated in accordance with Whistleblowing legislation and our policies.

If NCR Atleos receives credible information from an employee or any other source alleging prohibited trafficking-related activity, it will investigate and determine what, if any, remedial action is appropriate. It will also notify the appropriate governmental authorities as required by law.

Employment Practices and Procedures

NCR Atleos strives to maintain comprehensive employment practices and procedures designed to prevent modern slavery. These practices and procedures include the following:

- We adhere to the “Employer Pays” principle - No employee should pay for a job - the costs of recruitment should be borne by the employer.
- We work with recruiting companies with trained employees.
- We pay employee wages that meet or exceed legal wage requirements.
- We strive to hire only individuals who are lawfully permitted to work in the jurisdiction where they are employed.
- We work to explain key terms of employment to prospective employees during the hiring process, including wages and benefits; work location; living conditions and associated costs (if applicable); and whether the nature of the work is hazardous.
- We prohibit misleading or fraudulent recruiting practices and strive to only enter into employment contracts that contain, or we otherwise document, the salient terms of employment, including the pay rate and pay frequency in accordance with local law.
- We do not prohibit employees from terminating their employment.
- We do not destroy, conceal, confiscate, or otherwise deny access by any employee to his or her identity or immigration documents.
- We have established programs for international work assignments that comply with applicable law and may include provisions such as home visits, paid transportation to and from the home country, and reasonable living accommodations that meet or exceed host country housing and safety standards. Employees on international work assignments may choose to accept or decline provisions offered by the company.
- We strive to monitor, detect, and terminate any employees, agents, or subcontractors who have engaged in prohibited activities.

These practices and procedures are governed by several policies and codes including the: Human Rights Policy, Non-Discrimination Equal Opportunity Policy, Prohibition of Harassment Policy, Whistleblower Policy, Preemployment Verifications Policy, Employee Code of Conduct and the Supplier Code of Conduct.

ASSESSING EFFECTIVENESS AND RISKS IN SUPPLY CHAINS

NCR Atleos continues to assess and manage its modern slavery risks by carrying out due diligence of its suppliers by consulting third-party classifications of high-risk factors, sectors, commodities, and geographies, to inform our strategy. We also conduct internet searches and review information from governmental bodies regarding materials and regions with risk of forced or child labor. We gather

information on worker recruitment and maintain internal controls to ensure that all workers are recruited voluntarily. We have also developed and implemented due diligence policies and processes for identifying, addressing, and prohibiting the use of forced and child labor in the company and supply chain.

After onboarding, we continuously monitor for changes with the suppliers. Suppliers are required to have policies and procedures for identifying and prohibiting the use of forced labor and child labor in their activities and supply chains. To date, NCR Atleos has not conducted on-site child or forced labor audits. NCR Atleos also continues investing in third-party technology to identify high-risk factors, sectors, commodities, and geographies relevant to our operations and supply chain because the risks for modern slavery are constantly changing.

If NCR Atleos identifies items of significant non-compliance within our supply chain, irrespective of the nature of the supplier, we are committed to addressing concerns and seeking corrective action, and we are ultimately prepared to terminate the relationship if concerns are not adequately addressed. If any responses to the Onboarding Questionnaire raise any concerns, these are escalated to procurement senior management for review before the supplier is permitted to work with NCR Atleos. The review of such responses did not reveal any instances of modern slavery in our supply chain for the Reporting Period. Nor were any instances otherwise brought to our attention. We therefore did not take any steps to remediate modern slavery, including steps to remediate loss of income to the most vulnerable families as a result of any identified modern slavery.

We continue to review and consider how to improve in this area, particularly as our business grows, we engage new suppliers, and the risks of modern slavery occurring in our supply chain and operations evolve. We are in the process of establishing a method for the regular review and audit of the organization's policies and procedures, including those on forced and child labor. The NCR Atleos Group uses AlertLine to track grievances such as those related to the use of forced and child labor. To date, we have not received any related grievances. The effectiveness of our policies and approach will be monitored by subject matter experts within the Legal and Supply Chain functions.

We continue to be guided by the fundamental human rights due diligence principles espoused in the United Nations Guiding Principles on Business and Human Rights. As such, the internal reporting processes we implement to assess the effectiveness of our actions aims to integrate both appropriate qualitative indicators such as reviews, surveys and audits and quantitative indicators such as key performance indicators.

In 2025, NCR Atleos Group did not identify any controls or procedures that were found to be ineffective or in need of improvement.

Next Steps

In 2025, NCR Atleos did not find any instances of child or forced labor within our operations or the supply chain. As such, we have taken no measures to remediate forced or child labor or any associated issues (such as loss of income etc.).

For 2026, NCR Atleos will continue to review its supplier onboarding process and consider process improvement strategies for identifying and mitigating risk. As a result, NCR Atleos will continue to use a centralized modern slavery global process.

In 2026, NCR Atleos will add a Modern Slavery training module to our mandatory annual employee Code of Conduct training.

NCR Atleos will continue conducting at least one regional supplier onboarding and maintenance review annually, with the 2026 review planned for suppliers operating in, or sourcing from, India.

In future disclosures, NCR Atleos plans to incorporate additional reviews of its internal systems to ensure that all suppliers can be separately flagged for enhanced due diligence, number of escalations from onboarding questionnaire, number of employees completing the modern slavery training module.

In 2026, NCR Atleos will enforce accountability by requiring procurement leaders to periodically confirm completion of supplier risk reviews and escalation procedures where applicable.

In 2026, NCR Atleos will enhance our review process by implementing an annual cross-functional review of modern slavery risks involving Legal, Supply Chain, Ethics and Compliance and Sustainability. The review will identify gaps, if any, and assess the effectiveness of controls. Results of the annual review will be reported to the Enterprise Risk Committee.

NCR Atleos will provide the Training to all staff on its Code of Conduct to ensure all staff are familiar with the relevant policies for 2026. A new modern slavery training module will be implemented in 2026 to further enhance workforce awareness of forced labor risks and reporting expectations.

Progress against these objectives will be monitored and described in future Modern Slavery Disclosures. These actions are intended to strengthen NCR Atleos' continuous improvement framework while building on existing processes and governance structures.

NCR Atleos will make this Modern Slavery Statement available on its website.

CONSULTATION PROCESS

This statement was prepared in consultation with each of the NCR Atleos' Legal, Human Resources and Compliance teams, as well as external advisors as needed. It was prepared in consultation with each of the relevant companies that NCR Atleos owns or controls in the development of this statement.

This statement was reviewed by the Chief Executive Officer and General Counsel and approved by the Board of NCR Atleos Corporation on June 25, 2026 and is signed on its behalf by Timothy C. Oliver, Director, President and Chief Executive Officer.

Signed 
Tim Oliver (Jun 26, 2026 12:49:16 CDT)