

Modern Slavery Statement

INTRODUCTION

This Modern Slavery Statement, published pursuant to section 14 of the Modern Slavery Act 2018 (the **MSA**), describes the steps that NCR Australia Pty Limited (**NCR Australia**) has taken to address modern slavery in our organisation and in our supply chain.

This statement covers the fiscal year ending December 31, 2021 (the **Reporting Period**). This statement is prepared by NCR Australia for the Reporting Period.

OUR BUSINESS

Our Company

NCR Corporation was originally incorporated in 1884 and has developed to become a leading software- and services-led enterprise provider in the financial, retail, hospitality and telecommunications and technology industries. The solutions we provide help our customers, businesses of all sizes, run self-directed banking, stores and restaurants end-to-end and wall-to-wall, by making simple possible through our NCR-as-a-Service solutions that bring together all of the capabilities and competencies of NCR Corporation. These solutions enable us to be the technology-based service provider of choice to our customers. Our portfolio includes digital first offerings for banking, retailers and restaurants, as well as payments processing, multi-vendor connected device services, automated teller machines (ATMs), point of sale (POS) terminals and self-service technologies. We also resell third-party networking products and provide related service offerings in the telecommunications and technology sectors. Our business has evolved from providing hardware and services, to providing software and services within solutions that allow us to increasingly become strategic partners to our customers, helping them build their business strategies and deliver targeted business outcomes.

NCR Corporation is the ultimate parent company with global headquarters located in Atlanta, Georgia in the United States. NCR Corporation is committed to improving practices to combat slavery and human trafficking, and will not tolerate any such practices in its supply chain. NCR Corporation takes steps to minimise the risk of NCR Corporation working with any organisation that engages in such practices. As policy is set globally, NCR Corporation and NCR Australia use the same policies and procurement processes, this statement covers the measures adopted by NCR Corporation as a whole, with specific emphasis on the process in Australia.

Within Australia, NCR operates through its subsidiary NCR Australia, headquartered in Sydney, New South Wales.

In mid-year 2021, NCR acquired Cardtronics PLC and its wholly owned subsidiary Cardtronics Australasia Pty Ltd (Cardtronics).

Our Supply Chain

NCR Corporation manufacture hardware in facilities in Brazil, Hungary, India and Mexico. These facilities require manufacturing and non-manufacturing suppliers. NCR Corporation has a global supply chain, with over 10,000 suppliers providing raw materials, service parts, internally and externally used goods and services, software, labour, and transportation & logistics.



COMPANY POLICIES AND GOVERNANCE

Policies

NCR Corporation supports and respects the protection of internationally proclaimed human rights as proclaimed in the United Nation's Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact. We are committed to developing, maintaining, and improving systems and processes to avoid complicity in modern slavery both within our operations and throughout our supply chain.

This commitment is embodied in our Code of Conduct and our Human Rights Policy, which are reviewed regularly and updated as required. Our Code of Conduct specifically requires ethical business conduct, including maximum work days and work weeks, minimum wage levels and overtime compensation. Our Human Rights Policy formally documents our position that modern slavery is not tolerated, that we support internationally proclaimed human rights, are committed to developing, implementing and maintaining systems and practices that promote fair labour and environmental sustainability, and to creating a working environment that prevents and detects corruption and appropriately addresses instances of non-compliance.

Governance and Training

Each fiscal year, NCR Corporation requires all employees to complete a training and certification module on NCR's Code of Conduct (the **Training**). This Training reviews, among other topics, NCR Corporation's Human Rights Policy which emphasizes recognising and reporting suspected instances of compliance failures both inside NCR and within NCR Corporation's supply chains. At the end of the Training, each employee is required to certify that he or she will comply with the NCR Corporation's Code of Conduct, and to identify any concerns and exceptions so that they may be addressed.

In 2020, NCR Corporation and NCR Australia provided Training to all staff to ensure all staff are familiar with the relevant policies. The Training was revised in 2021 and all staff were required to again complete this Training.

Reporting

NCR Corporation employees are encouraged to speak up and report any concerns of wrongdoing and of the multiple avenues that NCR Corporation provides 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 can report concerns anonymously. NCR Corporation does not tolerate retaliation against individuals who make good faith reports of misconduct, including reports of potential violations of NCR Corporation policies or our commitment to fight modern slavery.

In accordance with its whistleblowing policy, NCR Corporation has long operated a safe and confidential whistleblowing process and actively encourages employees to use it if they become aware of any breach of any law or any NCR Corporation policy. NCR Corporation 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 NCR's own policies and procedures. NCR Corporation's internal audit procedures include reviews of NCR Corporation's compliance with our Human Rights Policy, including compliance with this statement.

Employment Practices and Procedures

NCR Corporation maintains 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 not by the employee but by the employer;
- We pay employee wages that meet or exceed legal wage requirements;
- We hire only individuals who are lawfully permitted to work in the jurisdiction where they are employed.



- We 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 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 with NCR Corporation and NCR Australia;
- We do not destroy, conceal, confiscate or otherwise deny access by any employee to his or her identity or immigration documents; and
- We have established programs for international work assignments that 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 the provisions offered by the company.

SUPPLY CHAIN POLICIES AND GOVERNANCE

Policies

NCR Corporation and NCR Australia expect that its suppliers will conduct business ethically and will comply with the law. NCR Corporation and NCR Australia requires its suppliers to agree in their contracts with us that they will conduct business ethically, comply with applicable laws and adhere to our Supplier Code of Conduct. NCR Corporation has adopted a Supplier Code of Conduct, which includes, among other things, a requirement to adhere to NCR Corporation’s Human Rights Policy, which prohibits modern slavery. It also represents NCR Corporation and NCR Australia’s desire to engage with suppliers that have a shared commitment to its ethical, legal and social business standards and values.

NCR Corporation and NCR Australia require suppliers to certify at the time they submit e-sourcing proposals to NCR Corporation and NCR Australia that that they conduct business ethically and that they either will comply with NCR Corporation’s Supplier Code of Conduct, or that they maintain a code of conduct that is consistent with best-in-class business ethics codes and that contains provisions at least as restrictive as those in NCR Corporation’s Supplier Code of Conduct, including the prohibition on modern slavery.

Due Diligence

As part of this supplier approval process, NCR Corporation has introduced an enhanced vendor vetting checklist to question suppliers who providing materials and are in countries with a high risk of modern slavery engagement (**Questionnaires**). In addition, these Questionnaires are sent to all these high risk suppliers annually to continually check for compliance. During the period 2021 – 2022 there was a voluntary response rate of approximately 80% of all global suppliers who responses to such Questionnaires, which is a significant increase from the voluntary response rate in 2020.

During 2021, NCR Corporation improved its third party risk management program, and reviewed over 50% of our supply base for modern slavery risk as part of that program. NCR Corporation conducts periodic business reviews with our highest spend and/or strategic suppliers. As part of these reviews, which may be conducted at a supplier’s facility, we require suppliers to review our Supplier Code of Conduct, including its human rights provisions, and to confirm they are in full compliance.

ASSESSING EFFECTIVENESS

If NCR Corporation identifies items of significant non-compliance within its supply chain, irrespective of the nature of the supplier, we are committed to addressing concerns and seeking corrective action. If any responses to the Questionnaire raise any concerns, these are escalated to procurement senior management for review before the



supplier is permitted to work with NCR Corporation. The review of such responses did not reveal any instances of modern slavery in our supply chain for the Reporting Period. Among other permitted methods of reporting, instances of modern slavery may be reported in accordance with NCR Corporation's whistle-blower policy and procedure, which allows for anonymous reporting.

The Training, which NCR Corporation conducts annually, also increases the awareness of the business in identifying issues and risks relating to modern slavery.

Next Steps

For 2021, NCR Corporation is invested in making its third party risk management tools and processes even more robust, including the management of modern slavery risk (the **Tools**). For 2022, we intend to continue to review these Tools and conduct a review and consolidation of NCR Corporation and Cardtronics' modern slavery global process. NCR Australia also intends to send out the Questionnaires to all applicable Australian suppliers in 2022-2023.

For 2022, NCR Corporation is continuing to improve its third party risk management program through use of automated process tools for identifying and mitigating risk, and we intend to complete the modern slavery risk review for the remaining 50% of our supply base. All new suppliers will be subject to modern slavery risk review during the onboarding process.

In 2022, NCR Corporation will provide Training to all staff on its Code of Conduct to ensure all staff are familiar with the relevant policies.

BOARD APPROVAL

This statement was again reviewed and approved by the Board of Directors of

- NCR Australia Pty Limited, who will review and update this statement on an annual basis.

CONSULTATION PROCESS

This statement was prepared in consultation with each of the NCR's Legal and Compliance teams, as well as external advisors as needed.

NCR Australia does not own or control any entities with whom it consults in making this statement. As NCR Australia and Cardtronics still have separate policies, processes and procedures, Cardtronics has prepared its own statement for the 2021 reporting period.

This statement is prepared by NCR Australia for the Reporting Period.

For more information, visit ncr.com, or email complianceoffice.ethics@ncr.com.



Signed: _____

Andrew Purvis
NCR Australia Pty Limited

Date of signing: 28 June 2022
Role: Director

