



Modern Slavery and Human Trafficking Statement

Introduction

This Modern Slavery Statement is made pursuant to section 14 of the Modern Slavery Act 2018 (Cth) (the **AU MSA**). This statement covers the fiscal year ending December 31, 2023 (the **Reporting Period**). It is published on behalf of Cardtronics Australasia Pty Ltd (**Cardtronics Australasia**) for the Reporting Period.

Our Company

In mid-year 2021, NCR Corporation acquired Cardtronics PLC and its wholly owned subsidiary Cardtronics Australasia (**Cardtronics Group**). In late 2023, NCR Corporation split into two independent, publicly traded companies – one focused on digital commerce and the other on ATMs. NCR Atleos Corporation focuses on ATMs and is now the ultimate parent company of Cardtronics Group together with applicable subsidiaries and affiliates (**NCR Atleos**). All references to NCR Atleos include Cardtronics Australasia and Cardtronics Group.

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

Our Statement

This statement describes the steps that NCR Atleos has taken to address modern slavery in our organization and in our supply chain. As policy is set globally, Cardtronics Group and NCR Atleos use the same policies and procurement processes. This statement covers the measures adopted by NCR Atleos as a whole.

When we use the term “modern slavery” in this document, we mean forced or coerced labor or domestic servitude of any type, child labor and human trafficking.

NCR Atleos is committed to conducting our business in a socially responsible manner and to operating in compliance with all applicable laws and regulations. Such laws and regulations include those related to child labor, slave labor, or any other form of forced labor (“forced labor”) in the 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 supplier has engaged in the use of forced labor or provided to NCR Atleos any merchandise, wares, articles, products, inputs, or any other goods (collectively, “items”) that are the result of forced labor.

SUPPLY CHAIN, POLICIES, AND GOVERNANCE

Supply Chain

NCR Atleos manufactures hardware in facilities in India, Mexico, and Hungary. These facilities 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 goods and services, software, 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. As such, NCR Atleos is committed to improving practices to combat slavery and human trafficking and will not tolerate any such practices in its supply chain. NCR Atleos takes steps to minimize the risk of working with any organization that engages in such practices.

Due Diligence and Policies

NCR Atleos expects that its suppliers will conduct business ethically and will comply with the law. NCR Atleos 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 (**Code of Conduct**). NCR Atleos has adopted a Code of Conduct, which includes, among other things, a requirement to adhere to NCR Atleos' Human Rights Policy, 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.

NCR Atleos requires its suppliers to certify to NCR Atleos that they conduct business ethically and that they either will comply with NCR Atleos' 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 Atleos' Code of Conduct, including the prohibition on modern slavery.

In 2020, Cardtronics Australasia and NCR Atleos had separate modern slavery policies and processes.

Cardtronics Australasia collaborated with external advisors on the creation of a modern slavery questionnaire in 2020, which in 2021 was sent out to all applicable vendors for better consideration of the modern slavery risks within the companies' supply chains. 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.

NCR Atleos introduced an enhanced vendor vetting checklist to question suppliers who are providing materials and are in countries with high risk of modern slavery (**Vetting Checklist**). During 2021 and 2022, the Vetting Checklist was sent out to all high-risk suppliers annually to continually check for compliance. Throughout 2021-2022, NCR Atleos improved its third-party risk management program and reviewed all of its suppliers for modern slavery risks.

In 2022, NCR Atleos and Cardtronics Australasia combined their modern slavery processes, and the Vetting Checklist was sent out to all applicable Australian suppliers.

As part of NCR Atleos' supplier approval process, NCR Atleos requires the completion of an Onboarding Questionnaire for all new suppliers, which includes a modern slavery risk review during the onboarding process and prior to being loaded as a supplier to NCR Atleos. The Onboarding Questionnaire considers several factors to assess the potential risks of modern slavery in our supply chains. The Onboarding Questionnaire was introduced for all new suppliers in 2022. Every new supplier onboarded in 2022 and 2023, was required to complete the Onboarding Questionnaire before being onboarded.

Training

Each fiscal year, NCR Atleos requires all employees to complete a training and certification module on NCR Atleos' Code of Conduct (**Training**). The Training reviews, among other topics,

NCR Atleos' Human Rights Policy which emphasizes recognizing and reporting suspected instances of compliance failures both inside NCR Atleos and within NCR Atleos' supply chain. At the end of the Training, each employee is required to certify that he or she will comply with the NCR Atleos Code of Conduct, and to identify any concerns and exceptions so that they may be addressed.

Reporting

NCR Atleos employees are encouraged to speak up and report any concerns of wrongdoing to any of the multiple avenues that NCR Atleos 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 Atleos does not tolerate 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 has long operated a safe and confidential whistle-blowing process and actively encourages employees to use it if they become aware of any breach of any law or any 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 and NCR Atleos' own policies and procedures.

Employment Practices and Procedures

NCR Atleos 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;
- 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.

ASSESSING EFFECTIVENESS AND RISKS IN SUPPLY CHAINS

NCR Atleos continues carrying out due diligence on its suppliers by consulting third-party classifications of high-risk factors, sectors, commodities, and geographies, to inform our strategy. 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. For 2024, NCR Atleos will continue to refine these processes.

If we identify items of significant non-compliance, 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 significant issues are not addressed.

If NCR Atleos 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 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.

Next Steps

For 2024, NCR Atleos will 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.

NCR Atleos will provide the Training to all staff on its Code of Conduct to ensure all staff are familiar with the relevant policies in 2024.

CONSULTATION PROCESS

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

This statement was approved by the Board of Cardtronics Australasia Pty Ltd on 21 June 2024 and is signed on its behalf by Andrew Wingrove, Director.

Signed  _____