

Modern Slavery Statement

INTRODUCTION

This Modern Slavery Statement, published pursuant to Section 54 of the Modern Slavery Act 2015, describes the steps that NCR Limited and NCR Financial Solutions Group Limited (“NCR”) have taken to address modern slavery in our organisation and in our supply chain. When we use the term “modern slavery” in this document, we mean forced or coerced labour or domestic servitude of any type, child labour and human trafficking. This statement covers NCR’s fiscal year ending December 31, 2021.

OUR BUSINESS

Our Company

NCR Corporation is the ultimate parent company with global headquarters located in Atlanta, Georgia in the United States. Within the United Kingdom, NCR operates through the subsidiaries NCR Limited, headquartered in London, England and NCR Financial Solutions Group Limited, headquartered in Dundee, Scotland. NCR Corporation is a global company that is headquartered in Atlanta, Georgia. NCR Corporation is a software- and services-led enterprise technology provider that runs stores, restaurants and self-directed banking for our customers, which includes businesses of all sizes. Our software platform, which runs in the cloud and includes microservices and APIs that integrate with our customers’ systems, and our NCR-as-a-Service solutions bring together all of the capabilities and competencies of NCR Corporation to power the technology to run our customers’ operations. Our portfolio includes digital first software and services offerings for banking, retailers and restaurants, as well as payments processing and networks, multi-vendor connected device services, automated teller machines (ATMs), self-checkout (SCO), point of sale (POS) terminals and other self-service technologies. We also resell third-party networking products and provide related service offerings in the telecommunications and technology sector. Our solutions are designed to support our transition to becoming a software platform and payments company.

Our Supply Chain

NCR Corporation manufactures 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. NCR is committed to improving practices to combat slavery and human trafficking, and will not tolerate any such practices in its supply chain. NCR takes steps to minimise the risk of working with any organisation that engages in such practices.

COMPANY POLICIES AND GOVERNANCE

Policies

NCR 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 updated 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.

Training

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

Reporting

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

In accordance with its whistleblowing policy, NCR 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 policy. NCR 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.

Employment Practices and Procedures

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

NCR requires its suppliers to certify at the time they submit e-sourcing proposals to NCR that they conduct business ethically and that they either will comply with NCR'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's Supplier Code of Conduct, including the prohibition on modern slavery.

Supply Chain Due Diligence

As part of NCR's supplier approval process, NCR 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 high risk suppliers annually to continually check for compliance. During the period 2021 – 2022 there was a substantial voluntary response rate from all global suppliers in response to such Questionnaires; 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 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.

NCR Addresses Concerns

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 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. 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's whistle-blower policy and procedure, which allows for anonymous reporting.

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

Next Steps

For 2022 NCR 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.

BOARD APPROVAL

This statement was reviewed and approved by the Board of Directors of NCR Limited on 21st December 2022 and by NCR Financial Solutions Group Limited on 21st December 2022. The Boards of Directors for these entities will review and update this statement on an annual basis.

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

Signed: Caroline Kee
Caroline Kee
NCR Limited

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Caroline Kee
NCR Financial Solutions Group Limited