

Code of Conduct

Last updated Feb. 2025

Letter from Tim Oliver

Team,

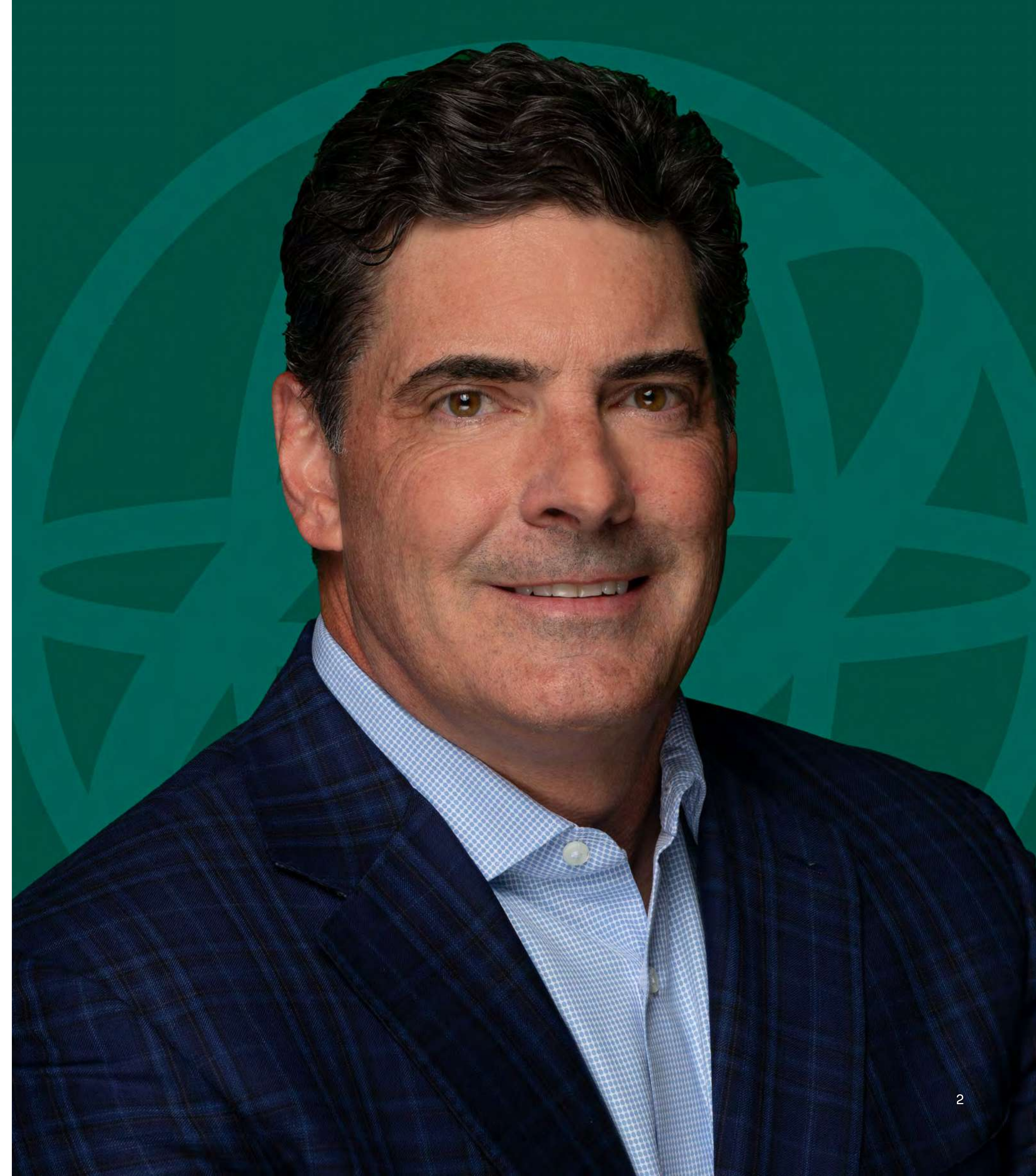
Personal responsibility and integrity are integral parts of everything we do at NCR Atleos. This is why one of our core values is accountability.

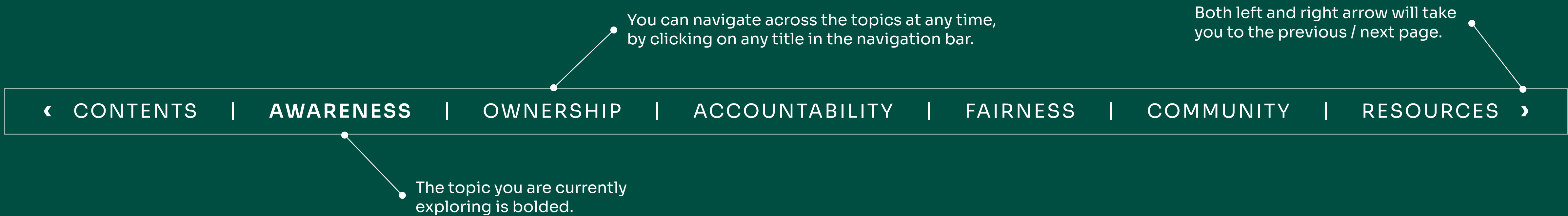
We are dedicated to doing business the right way, every day. Our customers, colleagues and stockholders are counting on us to deliver. We are committed to conducting business in accordance with the highest ethical standards and in compliance with all laws, rules and regulations governing our actions.

This Code of Conduct outlines our standards for business conduct, aligning everything we do as a company with an unwavering focus on our customers and our employees. The reputation of NCR Atleos must be fostered and earned every day as we chart our path forward.

We can never take that for granted, especially as we continue to build our future together and advance our purpose of expanding self-service financial access.

Tim Oliver
President and Chief Executive Officer
NCR Atleos





Spotlight

Spotlight calls out the important information; you do not want to skip this one!

Clouds

Word clouds will point you to more related content or some important information throughout this document.



This cloud tells you where to find more information about a topic and is accompanied by one or two of the document icons.



In some cases you may need help navigated your decision path or additional direction, and this cloud can give you an answer to your question.



This cloud includes fast facts, best examples and checklists for when you need a quick reference or confirmation.

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Awareness

- Core values
- What, who and why
- Policies
- How to report issues
- Manager responsibilities
- Employee responsibilities

Our core values

Modeling our core values to strengthen our culture

The action-oriented lists below will help you embody our core values in your daily tasks and interactions. By bringing these values to life, we all have the power to strengthen our culture and enhance our external reputation.



**ACCOUNTABILITY**

- Integrity
- Transparency
- Responsibility, ownership
- Cooperative, aligned
- Fearless



**COLLABORATION**

- Shared goals and vision
- Trusting and trustworthy
- Respectful of diverse perspectives, inclusive
- Open, engaged, supportive
- Partner and advisor to our customers



**INNOVATION**

- Impactful, productive
- Customer-driven
- Proactive, bold
- Visionary, industry leading, differentiating
- Resilient, adaptive

Code of Conduct

What?

The NCR Atleos Code of Conduct (“Code”) is our guide and point of reference for upholding our business principles. It sets the minimum standards for conducting business.

Our internal policies provide additional, detailed information that further develop the expectations outlined in this Code. The NCR Atleos Code of Conduct also supports how we each embody and live our values.

Who?

All NCR Atleos directors, officers, employees, contractors, agents and any other person representing or acting on behalf of NCR Atleos must read, understand and adhere to this Code. Employees who do not follow this Code may be subject to discipline, up to and including termination.

No one may direct you to violate, nor may you direct anyone to violate, this Code, even if doing so appears to be to our advantage. If a provision of this Code conflicts with applicable law, you must report the conflict to our Ethics & Compliance Office and comply with applicable law.

In addition, employees who violate the law may be subject to personal liability. Any waiver of any provision of this Code requires the approval of our General Counsel, or the Board of Directors if the waiver is requested by an executive officer or director.

Why?

Ethical behavior and corporate social responsibility can bring significant benefits to our business.

For example:

- Attract customers to our company’s products, and in doing so, boost sales and profits
- Motivate employees to stay with us, reducing turnover and increasing productivity
- Attract the best talent
- Attract investors who are increasingly focused on integrity, social responsibility and ethical conduct

Policies



Corporate Management Policies (CMP) define the way we do business and are organized by function such as: Employment (i.e., relocation), Compensation (i.e., vacations) and Law (i.e., copyright).



Corporate Finance and Accounting Policies (CFAP) support consistent application and control over accounting and financial operations across NCR Atleos.



Local, Departmental and Functional Policies, Procedures & Standards apply to certain offices or departments and are often driven by law, regulation or special circumstances.

Policies support our Code of Conduct and provide more details and framework for achieving our company’s goals and objectives.

They also:

- State NCR Atleos’ expectations
- Foster compliance with laws and regulations
- Maintain consistency throughout NCR Atleos
- Provide guidance for decision-making

All employees must comply with company established corporate policies, including supporting local policies and procedures.

Policy *noun (1)*

pol·i·cy /’pälesē/

plural: policies

1. a deliberate system of principles to guide decisions and achieve rational outcomes.
A policy is a statement of intent and is implemented as a procedure or protocol.

Ethics and compliance

Just as important as what we do, what we do not do also informs our story. We never stop asking why, never stop improving and never back down when facing tough challenges—even if that means changing.

In the end, it is our actions, not our words, that demonstrate how we conduct business at NCR Atleos. Our Ethics & Compliance department is dedicated to supporting our company in adhering to these critical policies year after year. By cultivating a culture of ethical behavior and compliance, we not only safeguard our reputation but also build trust with our customers, partners and employees.



The Ethics & Compliance team oversees our compliance with this Code and internal policies. The Ethics & Compliance department is independent from the business and every other function of the company and reports directly to our General Counsel.





You have read the policy but you are not sure if it completely applies to your situation, or you're still not certain about what to do? Here are some steps to help get you to the right answer:

1. Since NCR Atleos policies are designed to assist in decision making, your first step is to access and read the related policies carefully.
2. If studying the policy does not help and you are still unable to apply/interpret it for your situation, discuss the policy with your manager.
3. Still have questions? Contact the [Ethics & Compliance office](#).



How to report issues

If you are facing a dilemma and are unsure what course of action to take, you should raise your concerns with your manager, Human Resources or the Ethics & Compliance Office. If you suspect or learn of conduct that may violate this Code, you must raise your concerns with the Ethics & Compliance Office right away.

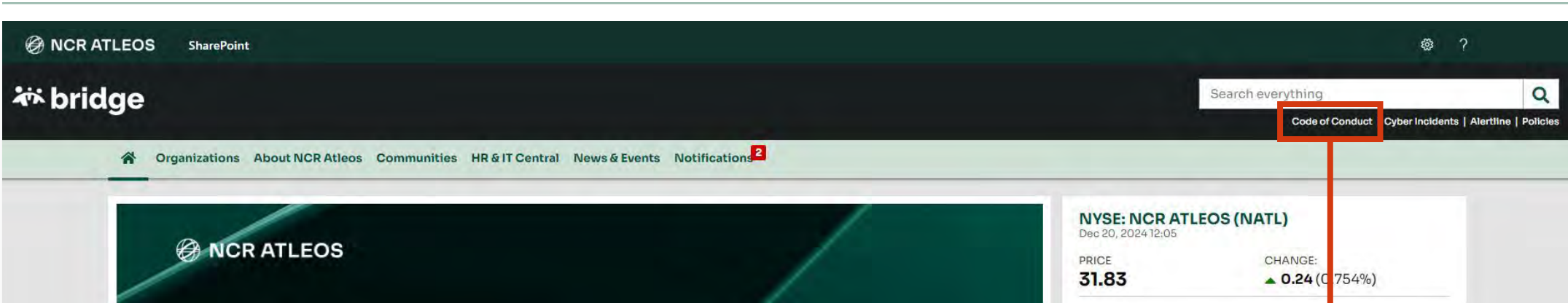
We do not tolerate retaliation against any person for making a good faith report. A good faith report is a report made with honesty and good intention. Whether the report is ultimately substantiated or not does not matter.

You can contact the NCR Atleos Ethics & Compliance Office by:

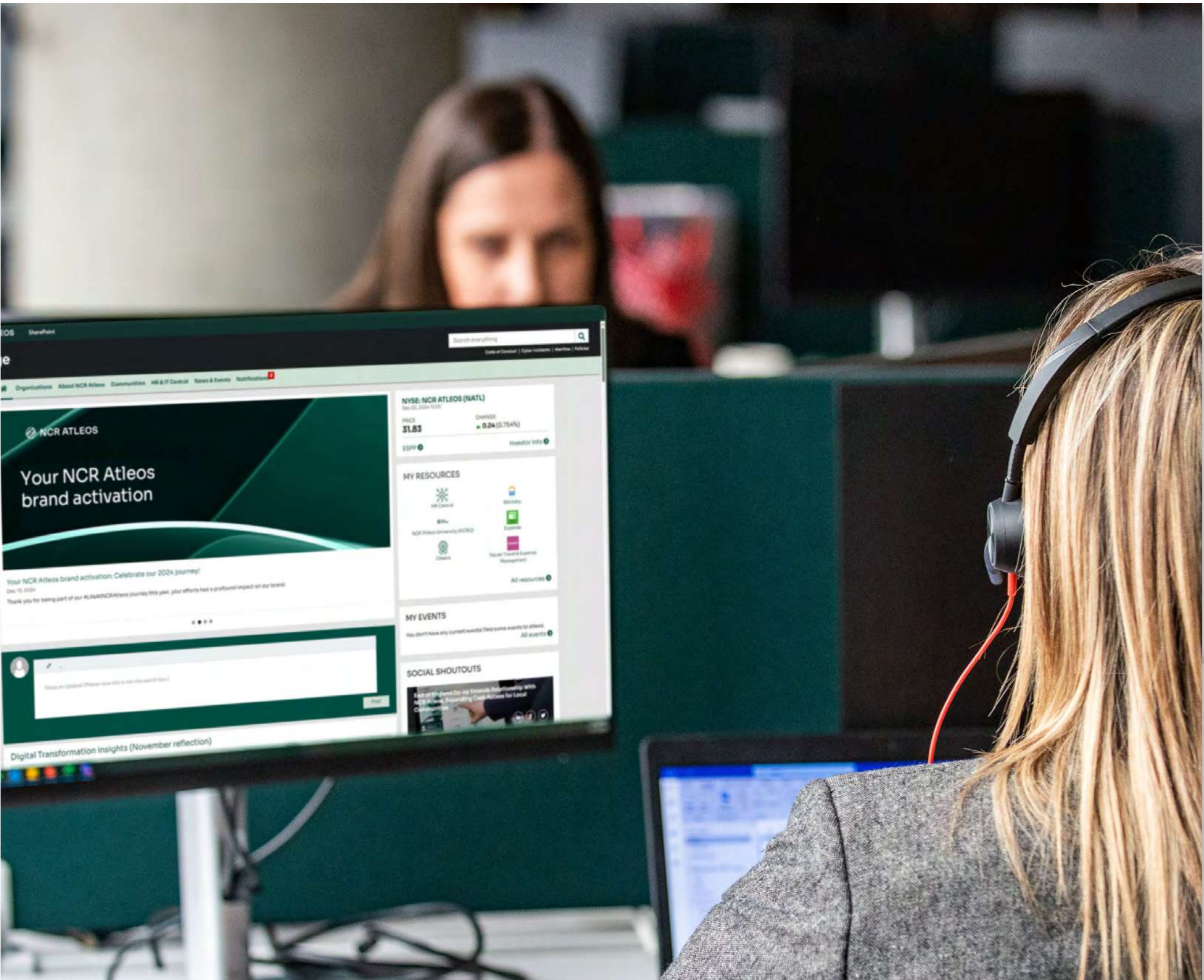
- 1. Making a web-based [AlertLine](#) report
- 2. Calling the AlertLine (in the U.S.: 1-844-539-2243. All other countries, [click here](#) for the applicable phone number for your country)
- 3. Sending an email directly to the Ethics & Compliance mailbox at ComplianceOffice.Ethics@ncratleos.com



You can find links to the Code of Conduct , AlertLine and Policies in the top-right corner of [Bridge](#).



Code of Conduct link



If you are uncomfortable identifying yourself to the Ethics & Compliance Office, you may ask questions and raise concerns anonymously, where permitted by law. Anyone who attempts to retaliate or who retaliates against an individual for making a good faith report may face disciplinary action, up to and including termination of employment.

Investigations

Our Ethics & Compliance Office investigates every report alleging violations of our core values, Code of Conduct and policies. You may not conduct investigations of alleged violations yourself. To ensure that each matter is treated confidentially and consistently, all matters will be investigated by the Ethics & Compliance Office.



When in doubt, consider the following:

- Is this against company policy or the law?
- What feels wrong about this situation?
- How will I be affected?
- How will our stakeholders be affected?

We expect you to comply with this Code while conducting business. If you know of or suspect Code violations, we expect you to report them to our Ethics & Compliance Office.

If you see something—say something!

In any way that makes you feel comfortable, you can:



Talk to your direct manager and try to resolve the issue.



Talk to your local HR business partner or Human Resources.



Send an email to E&C team and raise the issue directly with Ethics & Compliance Office.



Open a case through HR Central about the issue.



Submit an Alert Line report through a third-party tool, anonymously.

Manager responsibilities

Set the tone, lead with integrity and foster trust and accountability

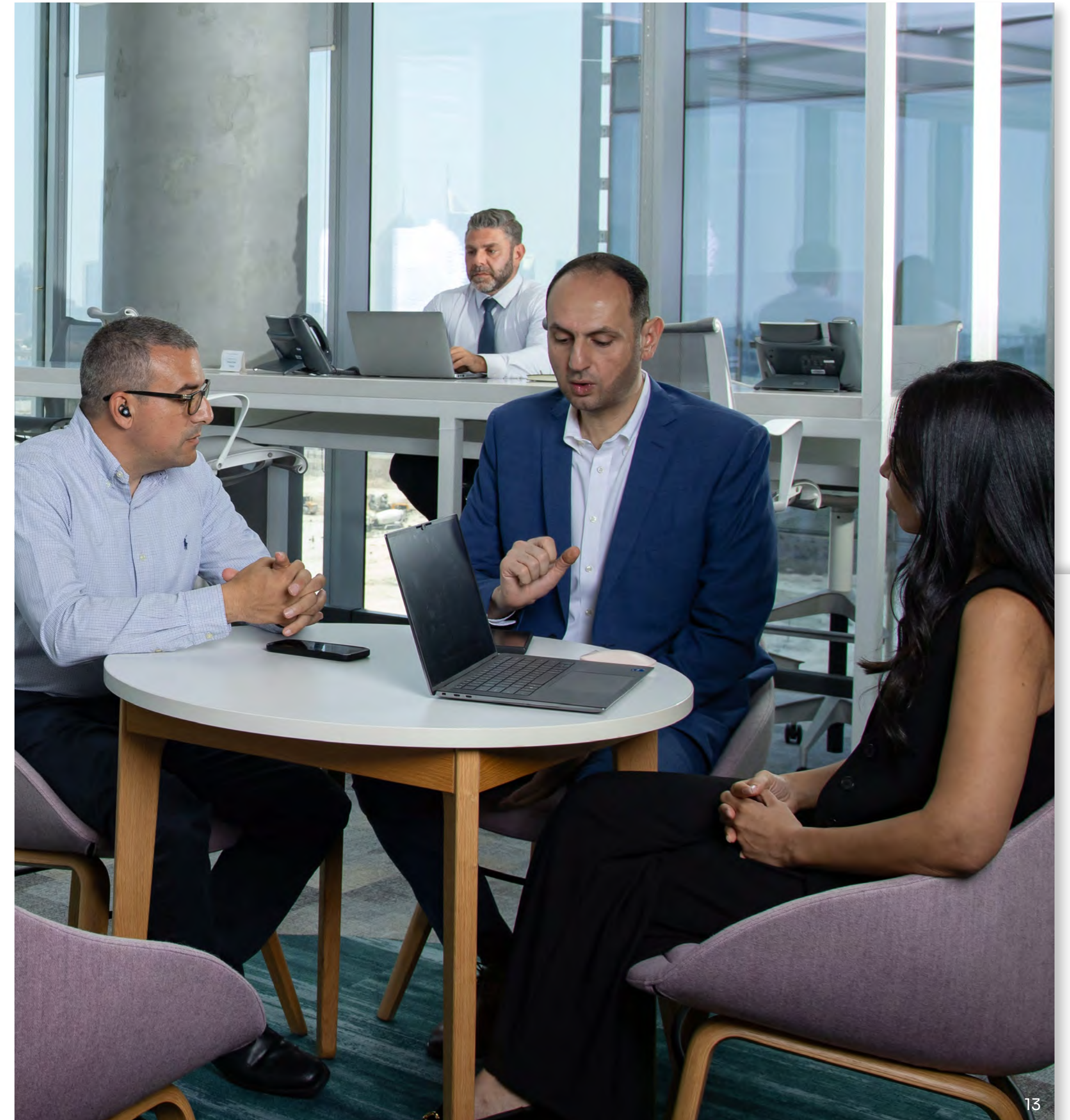
As leaders within NCR Atleos, managers must uphold and embody our core values, principles and ethical standards. They are expected to lead by example.

Managers who are responsible for supervising other employees have a special responsibility to ensure their team members understand the expectations outlined in the Code of Conduct and to model the desired behavior.

Discuss ethical behavior with your team and encourage them to integrate these policies into their daily routines.

Create the right environment

- Model ethical conduct. Lead the way in demonstrating ethical behavior in all decisions and actions.
- Encourage open communication and foster an environment of trust where employees feel comfortable raising concerns.
- Be accountable for your actions as managers.
- Communicate what is expected of team members.
- Address concerns and enforce consequences objectively and consistently without bias.
- Safeguard the confidentiality of those who feel comfortable raising concerns, ask questions and report violations of the Code of Conduct or other company policies in good faith without retaliation.



Employee responsibilities

We rely on our employees to uphold the Code. If you think there is a violation of the Code, or if you think an activity or behavior could lead to a violation, it is your responsibility to speak up.

By asking questions and reporting concerns, you are doing the right thing and helping our company stop or prevent misconduct.

Retaliation is strictly prohibited and goes against our core values. We are committed to maintaining a safe and supportive work environment where all employees feel empowered to report concerns in good faith without fear of retribution. Employees are expected to act with honesty and integrity in all their professional interactions and decisions.

- Employees must adhere to all relevant laws, regulations and company policies.
- Protecting sensitive information and respecting privacy is crucial. Employees should not disclose confidential information without proper authorization.
- Employees should avoid situations where personal interests could conflict with their professional duties
- Treating colleagues, customers and stakeholders with respect and fairness is essential. This includes avoiding discrimination, harassment and bullying.
- Employees should use company resources responsibly and for their intended purposes.
- Employees are urged to report any violations of the Code of Conduct or unethical behavior they observe.

We do not retaliate.

Any employee who engages in retaliation will face disciplinary action, which could include termination of employment.



Ownership

- IT infrastructure
- Technical standards
- Funds and property

IT infrastructure

Our Information Technology (“IT”) infrastructure consists of servers, networks, workstations, laptops, mobile devices, communications equipment, electronic media and storage devices both operated directly by the company as well as by contracted service providers of the company. It should generally be used only for conducting business, although occasional limited personal use may be permitted.

You cannot use personal email accounts (such as Gmail) to conduct business, nor can you send sensitive information or documents to your personal email accounts.

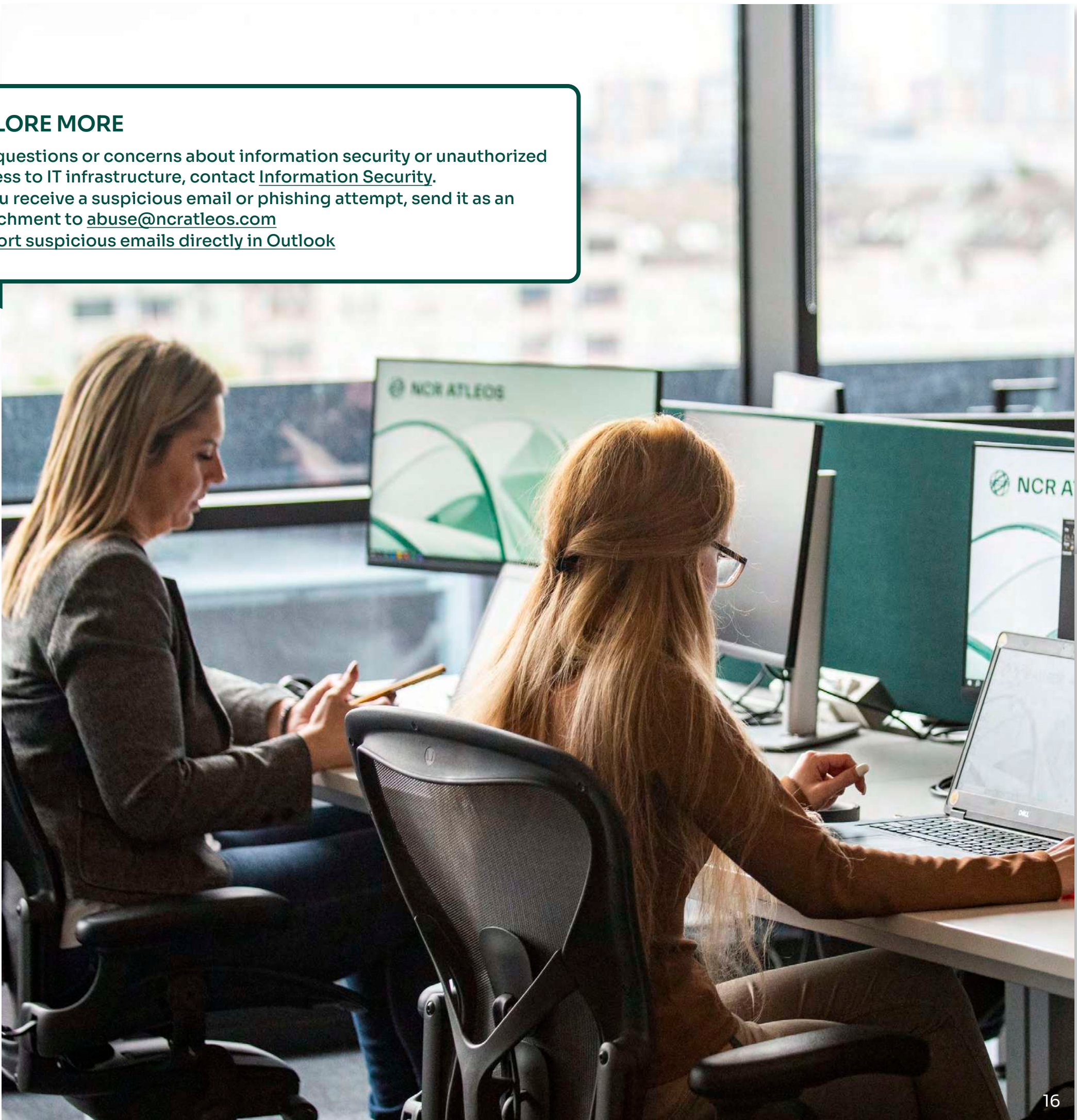
Except where prohibited by applicable law, we reserve all rights to search and review any information sent, received, viewed, accessed or stored using NCR Atleos’ IT infrastructure.



How we use our personal devices is our own business, but when we are using them for work, or to connect to NCR Atleos’ IT Infrastructure, this Code and our policies apply.

EXPLORE MORE

- For questions or concerns about information security or unauthorized access to IT infrastructure, contact [Information Security](#).
- If you receive a suspicious email or phishing attempt, send it as an attachment to abuse@ncratleos.com
- [Report suspicious emails directly in Outlook](#)



Software and downloading

Examples of software that caused malware issues in the past include:

- Tor Browser
- Utorrent
- Bittorrent
- Xunlei, also known as Thunder
- FDM or freedownloadmanager

You can't use personal e-mail accounts (such as Gmail) or **personal messaging platforms (such as WhatsApp)** to conduct business, nor can you send sensitive information or documents to your personal e-mail accounts.

You should avoid downloading games and movies, as these files often include malware. Individuals who do so will be subject to disciplinary action up to and including termination. To access approved software, please visit the [IT Central](#) page on Bridge.

Do not use peer-to-peer or torrenting software, install games or use anonymous proxy software.

These programs and activities, beyond putting strain on the network, often install malicious code, such as spyware, which can harm NCR Atleos' IT infrastructure.

EXPLORE MORE

[CMP#1701](#) is our IT infrastructure policy



Technical standards

There are numerous organizations that develop or promote technical standards. If you wish to engage with any technical standard bodies or working groups, especially in conjunction with and prior to submission of any technical standards, you must first obtain written approval from the Legal department.

Open source

Open source generally refers to software code that utilizes an open development process and is licensed to include the source code.

NCR Atleos may choose to use open source components for a variety of purposes. This source code is available without a charge and may permit users to use, modify and distribute any resulting software.

Before using open source software components with any NCR Atleos product, service or internal project, you must obtain prior written approvals from the technical teams in the Technology organization and the Legal department.

NCR Atleos respects the intellectual property rights of others and must strictly comply with the license requirements under which open source software is distributed.



Company funds and property

We all must protect company assets from loss, theft, damage or unauthorized use or disclosure.

These assets include tangible assets (such as computer equipment and furniture) and intangible assets (such as confidential information and data).

Company assets include but are not limited to:

- Trademarks and service marks
- Source code, trade secrets, personal data, client data, proprietary information
- Confidential information
- Money and charge cards
- Land and buildings
- Records
- Vehicles
- Keys and identity cards
- Technology equipment including printers, scanners, copiers, telephones, laptops and cell phones
- Computing devices and software
- Internet, intranet and other networks
- Scrap and obsolete equipment

Copyrights and intellectual property

Intellectual Property (IP) laws protect intellectual property from unauthorized use, duplication, distribution, display and performance. Infringing on IP rights can result in legal penalties and, in some cases, damage to our own IP rights. We all must protect the company’s IP rights and respect the IP rights of third parties.

A trademark typically protects brand names and logos used on goods and services.

A copyright protects an original written, artistic or literary work.

A patent protects an invention.

Accountability

- Conflicts of interest
- Company records
- Confidential information
- Artificial intelligence
- Compliance

Conflicts of interest

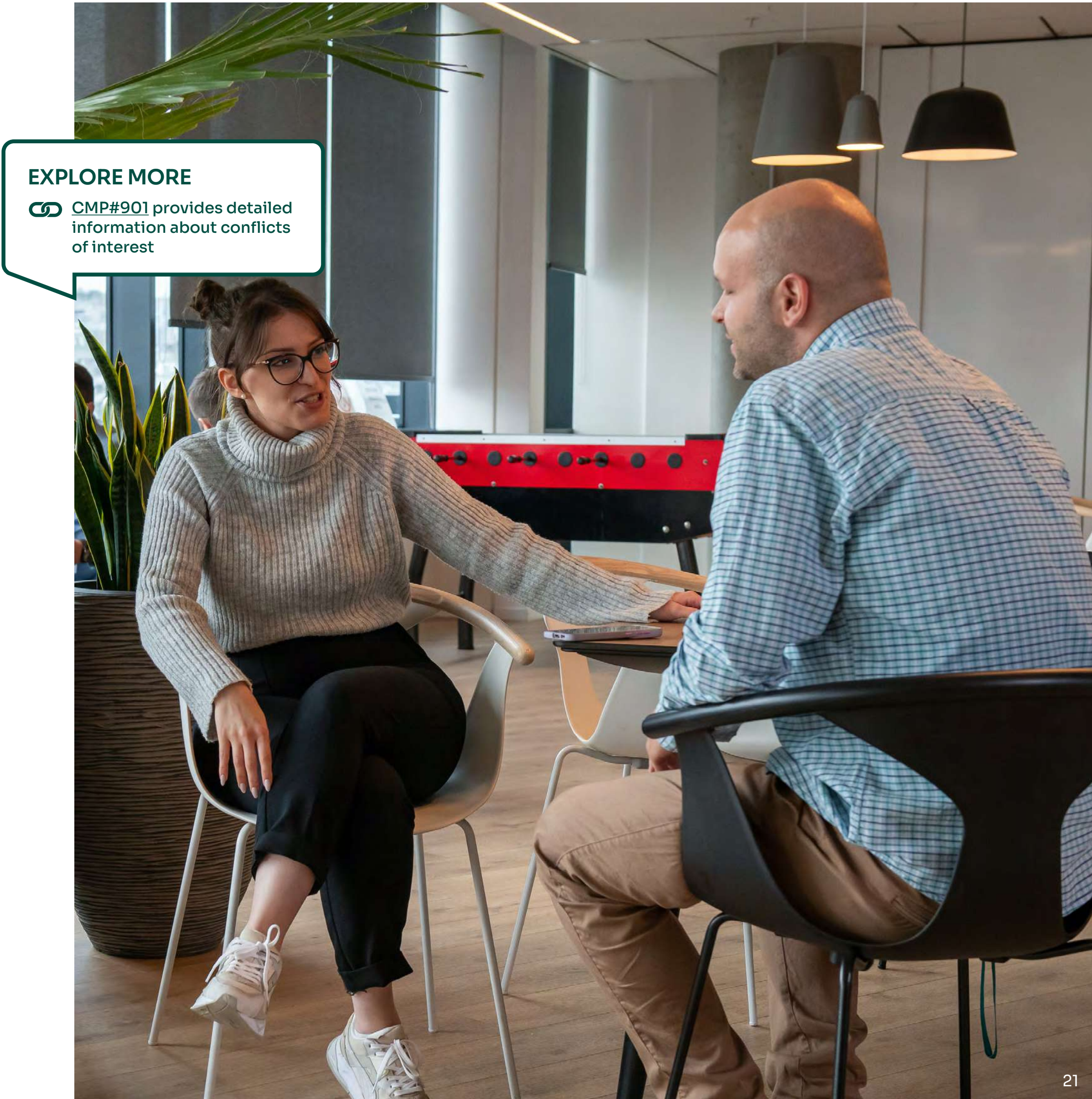
You must always act at an arm’s length basis and in the best interests of the company when conducting business with outside parties on our behalf. Conflicts of interest arise when personal interests influence, or appear to influence, our ability to make impartial decisions. Conflicts of interest can arise for many reasons, including personal activities, interests and relationships. You may not conduct any business if you have, or even appear to have, a conflict of interest that could affect your ability to act in our best interests.

Even the appearance or perception of a conflict of interest can place our company at risk. As employees, we should never allow divided loyalties or personal gain or benefit to prevent us from doing what is in the best interest of our company.

If you have a conflict of interest, or if a situation arises that makes it appear you may have a conflict of interest, you must disclose the situation to your manager. Your manager will discuss the matter with the Ethics & Compliance Office so that the conflict can be assessed and appropriate measures can be taken. Disclosure of all actual or potential conflict situations is mandatory.



Remember, it is not possible to list every potential conflict of interest scenario. If you are not sure if a situation represents a conflict, ask your manager, Human Resources Business Partner, or the Ethics and Compliance office.



Conflicts of interest: Think it through

- Will this activity or relationship influence, or appear to influence, my ability to make sound and unbiased business decisions or otherwise interfere with my ability to do my job?
- Will I personally gain something or will a family member benefit from my involvement in this activity based on my status as an employee of NCR Atleos?
- Will I be using company assets for personal gain?



You have been approached to sit on the Board of Directors of another company.

You should inform your manager to review the situation and receive guidance on whether you can accept the position. Next, report the position to Ethics & Compliance Office. We need to fully understand the position before we can confirm it will not create a conflict of interest with your position at NCR Atleos.



A conflict of interest can happen when:

- You take on additional employment that pulls your attention away from your NCR Atleos responsibilities. It may be impossible to fully and faithfully perform both jobs.
- You supervise or do business with someone with whom you have a close personal relationship, or if you and a family member are employed by the same NCR Atleos organization. This can cause an actual or apparent conflict of interest as people can assume favoritism whether or not it exists.
- You invest in one of our suppliers, customers, business partners or competitors.
- You use the NCR Atleos name or our property or information, without approval, to support a charitable, professional or community organization.
- You take for yourself a business opportunity that belongs to NCR Atleos.

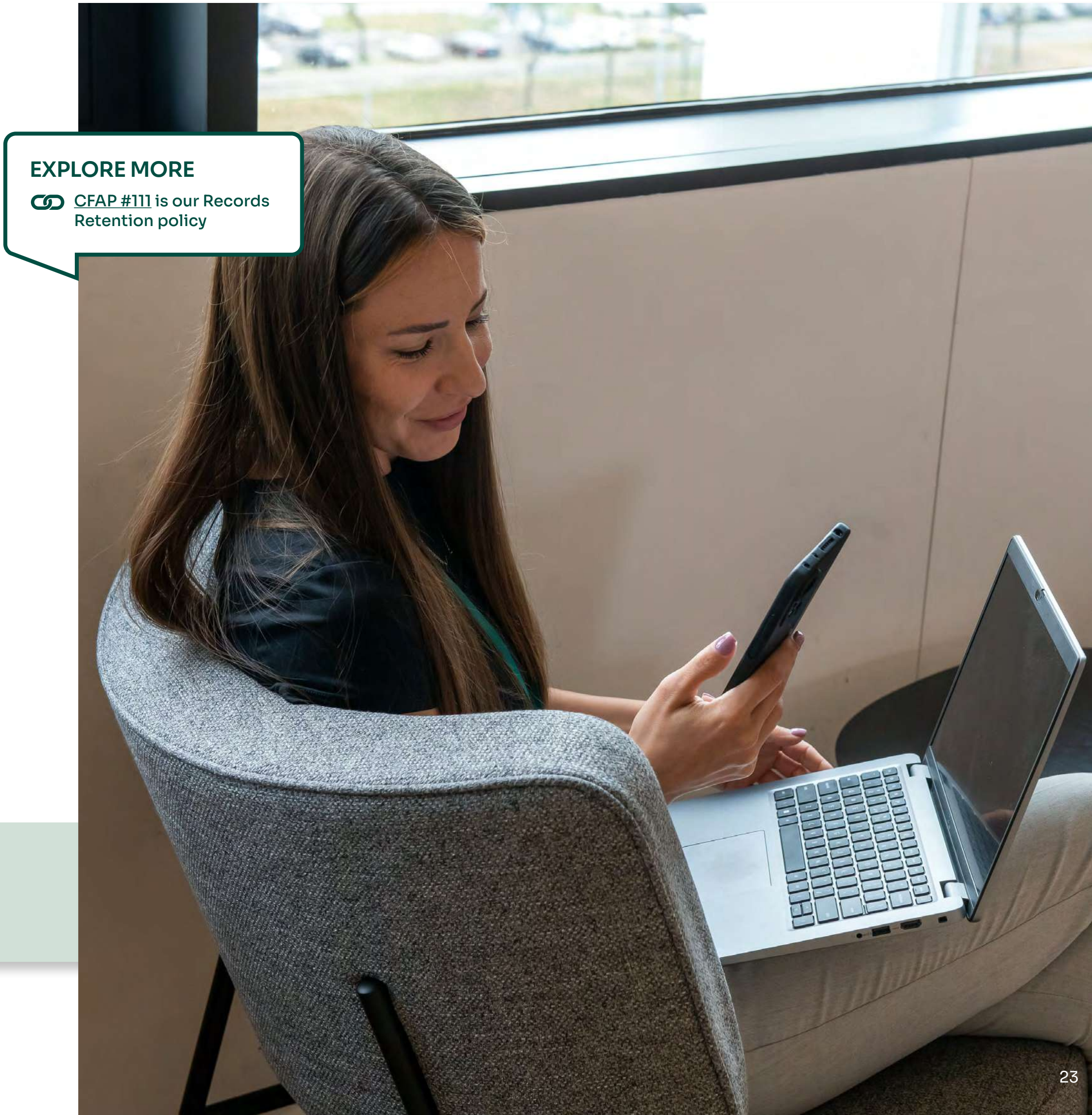
Accuracy and retention of company records

We are required to maintain complete and accurate business records to meet financial, legal and management obligations. We use this information to fulfill our obligations to various stakeholders, such as directors, customers, suppliers, shareholders, employees and government agencies. Everyone must follow our internal controls and procedures to ensure that all transactions are properly authorized, that our assets are safeguarded against unauthorized or improper use and that all transactions are properly recorded and reported in accordance with our internal policies and applicable law.

Our financial reporting must be timely, accurate and supported by appropriate underlying records and documents.

You must inform our corporate controller or your regional controller if you become aware of any material non-financial information or any financial information that affects the company or could result in a gain or loss for the company. The Ethics & Compliance Office can help you make your report. This information must be properly recorded, processed, summarized and reported to senior management to allow timely decisions regarding required disclosures.

Proper record retention is important to ensure records are systematically maintained and available to satisfy corporate, governmental and other requirements.



Confidential information

Confidential information encompasses non-public information and certain data generated by the company or maintained on behalf of others.

If disclosure of any confidential information is necessary for a legitimate business purpose, consult with the Legal department to put appropriate protections in place prior to disclosure.

Maintaining confidentiality within NCR Atleos is important

At times, you may have access to restricted confidential information that may not be shared within the company, such as personnel data or strategic plans.



Some examples of confidential information are:

- Trade secrets and know-how
- Research and development, including inventions, patent applications and engineering and laboratory notebooks
- Customer, stockholder and supplier lists and information
- Network management information
- Confidential manufacturing processes or procedures

EXPLORE MORE

[CMP #926](#) provides additional details regarding confidential information distribution



Acceptable use of artificial intelligence

NCR Atleos maintains policies and procedures designed to ensure that any artificial intelligence (“AI”) is used in a fair and non-discriminatory manner. Our policy regulates the use of AI to generate any software code and provides for the use of pre-approved tools. Additionally, if you use an AI tool, you are responsible for ensuring that you do so in a trustworthy and accountable manner. NCR Atleos policy also prohibits the use of AI to make any non-human reviewable decisions regarding hiring, promotion or termination of an individual’s employment.

EXPLORE MORE
 [CMP #1407 provides additional details regarding artificial intelligence](#)



Compliance with laws, this Code and policies

You must comply with this Code, all our internal policies and all applicable laws and regulations when conducting NCR Atleos business. You may not direct anyone to or assist anyone with violating this Code, all our internal policies and/or all applicable laws and regulations when conducting NCR Atleos business.

Ignorance of this Code or the requirements of a particular policy will not excuse a violation.



Your manager cannot instruct you to violate NCR Atleos policy. If you are concerned that an NCR Atleos policy conflicts with legal requirements, escalate your concerns to the Ethics & Compliance Office [via email](#) or the [AlertLine](#).



Fairness

- Anti-bribery and anti-corruption
- Competition
- Investment rules and insider trading
- Trade compliance

Anti-bribery and anti-corruption

As a global company, we are subject to many anti-bribery and anti-corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. These laws and regulations prohibit providing, promising or receiving anything of value, directly or indirectly, to or from a third party to influence their judgment or conduct.

Violating anti-bribery and anti-corruption laws and regulations can lead to large fines and penalties and can cause serious harm to our reputation. In addition to damaging our reputation, violating anti-corruption laws and regulations can subject both you and the company to severe civil and criminal penalties.



Do not bribe anyone, anytime, for any reason.

You may not promise or provide bribes to or receive bribes from any person. You must report any attempt to give or receive a bribe to our Ethics & Compliance Office right away. Facilitation payments, which are made to expedite or secure the performance of routine, lawful actions, are also prohibited.

EXPLORE MORE
 [CMP #904 sets our expectations for business conduct](#)



Anti-bribery and anti-corruption cases

Case #1 – Deutsche Bank AG

In 2021, Deutsche Bank AG agreed to pay more than \$43 million to settle charges that it violated U.S. anti-corruption laws by making improper payments to intermediaries in China, the UAE, Italy and Saudi Arabia.

Case #2 – Honeywell International Inc.

In 2022, Honeywell International Inc. agreed to pay more than \$81 million to settle Securities and Exchange Commission (SEC) charges that it violated provisions of the Foreign Corrupt Practices Act (FCPA) in a bribery scheme.

Case #3 – RTX Corporation

In 2024, RTX (formerly Raytheon Company), agreed to pay over \$124 million to resolve SEC and Department of Justice charges arising out of a multiyear bribery scheme from 2015 to 2022.



Competition

We deal fairly with our customers, suppliers, strategic partners, employees and competitors. We compete vigorously but always fairly and ethically. Our successes come from the strength of our people, products and services—not from unfair business practices.

You may not use deception or misrepresentation in your dealings on behalf of the company nor abuse confidential information. Additionally, special care must be taken when dealing with government customers. We choose suppliers based on merit, considering factors such as price, quality, delivery capability, technology, design and reputation for service and integrity.



Activities that might be appropriate when working with private-sector customers may be considered improper and even illegal when dealing with government entities and their employees.



Anti-bribery and anti-corruption quick check

- **NO reciprocal agreements:** agreeing that if one party will buy from a second party, on the condition that the second party will buy from the first party.
- **NO market allocation:** agreements to divide up or allocate markets with third parties.
- **NO bid rotation:** cooperating with a competitor to allow them to win an opportunity in exchange for their cooperation for our winning another opportunity.
- **NO price fixing:** agreeing with third parties to set prices at a certain level or to maintain certain market conditions.
- **NO refusals to deal:** agreeing with third parties to refuse to deal with any specific customer, supplier, or group of customers or suppliers, in violation of the law.
- **NO abuse of size:** using market power to improperly disadvantage smaller competitors.
- **NO abuse of data:** using data analytics for improper or illegal purposes.



Investment rules and insider trading

You may not, directly or indirectly, trade in our securities while in possession of “material non-public information” about the company.



Material non-public information is any information about a company that has not been widely disclosed to the public and is likely to influence an investor to buy, sell or hold that company’s security.

It could be a major pending acquisition, merger or divestiture; actual or projected financial information not yet public; new or loss of, major contracts, products or discoveries; major organizational changes; significant changes to capital structure; or other significant or major business plans or developments.

You are also prohibited from directly or indirectly trading in the securities of other publicly held companies, such as customers and vendors, based on material non-public information. It is illegal and against policy for you to share material non-public information about NCR Atleos or another company with friends, family members or other third parties (this is called “tipping”). You may not engage in any transaction where you may profit from short-term speculative swings in the value of our securities.

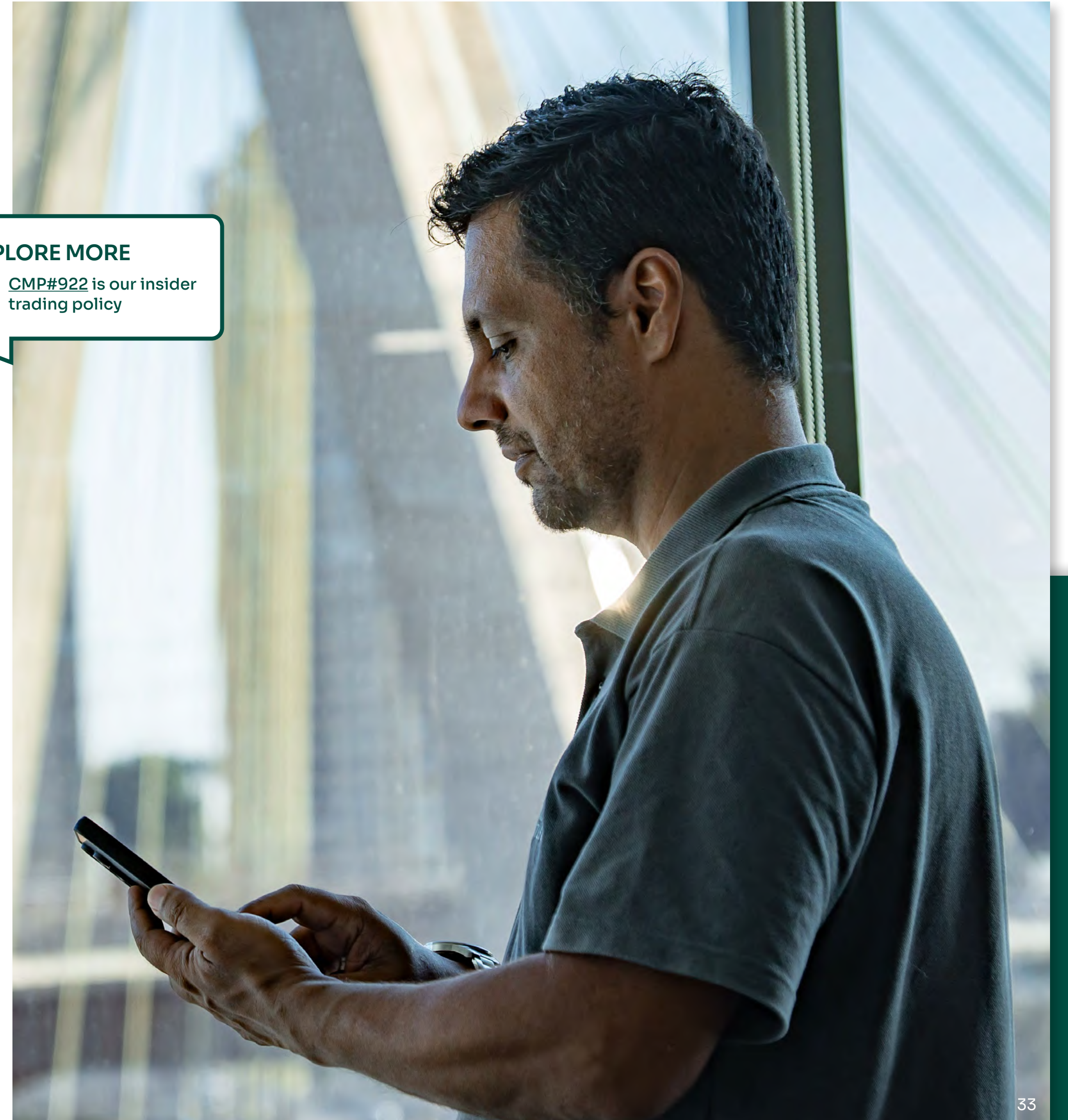


Investment rules and insider trading quick check

- Never provide material non-public information about NCR Atleos or other companies known to you through your work at NCR Atleos
- Restrict access to material non-public information about NCR Atleos or other companies to those employees who “need-to-know” that information for business reasons (such persons may be identified in a non-disclosure agreement)
- Do not advise or encourage another person to trade in a company’s stock if you have material non-public information about that company
- Never buy or sell NCR Atleos securities or another company’s publicly traded stock while in possession of material non-public information, whether or not a blackout period is pending

EXPLORE MORE

 [CMP#922](#) is our insider trading policy



Trade compliance

As a global company, we must be aware of international trade laws and regulations that regulate the imports and exports of our products and services. This includes understanding tariffs, trade agreements and compliance requirements in different regions to ensure smooth and lawful operations. Additionally, we must stay updated on changes in regulations to mitigate risks and capitalize on new opportunities in the global market.

Import laws and regulations typically govern what can be imported into a country, how the articles must be marked, how the imported merchandise must be valued and what duties must be paid.

Export laws and regulations typically govern whether export of a good or service is permitted and how it may be exported.

Trade laws and regulations govern all aspects of trade, including access restrictions, sourcing requirements, economic sanctions, embargos and antiboycott requirements.

You may only import or export products and services using processes approved by the Trade Compliance department.



If there appears to be a conflict between laws and regulations, customs or local practice, get help from the Trade Compliance department.



Export laws and regulations typically require consideration of the following questions:

- What is the commodity, software or technical information to be exported?
- To whom will the commodity, software or information be provided and would they be allowed to access or receive it?
- Where will the product be exported?
- How will the product be used?

Trade compliance scenario

You are getting ready for your business trip and a colleague asks you to bring an item for testing to our office in another country.

What should you do?

While it is simple to pack an item in your bag and travel to another country, there are specific requirements to do this legally. Hand-carrying commercial goods, professional equipment or other NCR Atleos related goods while traveling is subject to export/import laws and regulations of the U.S. as well as other countries.

While the U.S. and other countries laws and regulations may permit hand-carry of personal items (i.e., laptops, cell phones, digital storage devices and commercial NCR Atleos products), transporting commercial goods in your personal luggage requires pre-approval. For approval and advice on how to do this legally, contact Trade Compliance in the Legal department.

For questions regarding imports, contact: brokers.importncratleos@ncratleos.com

For questions regarding exports, contact: ncratleos.export@ncratleos.com



Community

- Non-discrimination, harassment and equal employment opportunity
- Safe work environment
- Gifts and contributions
- Human rights
- Social media

Non-discrimination, harassment and equal employment opportunity

We do not permit any form of discrimination or harassment based on race, color, ancestry, religion, creed, national origin, gender, gender identity or expression, sex, pregnancy, sexual orientation, age, disability (physical or mental), marital status, medical condition, genetic information, veteran status, political affiliation, military service or any other basis protected by law.

All employment-related decisions must be based upon legitimate job-related factors, including qualifications, experience, skills and performance.



NCR Atleos does not tolerate discrimination or harassment. This applies to everyone – not only our people but also our suppliers, our customers and our partners.

Non-discrimination and equity

Respect is the foundation of ethical behavior, and mutual respect reinforces good relationships. Mutual respect is accepting differences in a respectful manner in situations when two people may not agree.

We should grant each other the right to be heard and ensure equal opportunities for everyone, regardless of their differences. Having mutual respect involves recognizing differences, understanding their significance, and responding with awareness, politeness and care.

A lack of mutual respect could lead to unethical behavior such as bullying or harassment. All employees should work to create an environment where everyone feels welcomed, fairly treated and fully supported to do their best.

Non-discrimination, harassment and equal employment opportunity policies



We do not tolerate conduct that creates an intimidating or offensive work environment. We prohibit all types of harassment and bullying, including physical, verbal and visual. If managers become aware of this conduct, they have a ‘duty to act’ and report the behavior to HR or Ethics and Compliance.

EXPLORE MORE

- [CMP#701](#) addresses non-discrimination and equal employment opportunity
- [CMP#702](#) is our harassment policy
- [CMP#210](#) is our misconduct policy



Safe work environment

At NCR Atleos, we have a zero-tolerance policy for acts or threats of violence. Everyone must report any suspicious activity, including threats and actual acts of violence occurring while conducting business both on and off our premises. We prohibit the possession of weapons in the workplace.

We prohibit the unlawful use, possession, distribution or sale of controlled substances on our premises, in our vehicles and while conducting business or representing the company.

You may not use or be under the influence of alcohol or marijuana, even where use is lawful, while conducting business. If alcohol is permitted during social events, you are expected to exercise good judgment and moderation.



Remember, social events, such as company holiday parties, client events and office happy hours are work events where this Code applies.

Everyone must comply with the health and safety practices established by law, Human Resources, Environmental, Health and Safety (EHS) and Global Security and must report accidents, injuries and known or suspected unsafe conditions, procedures or behaviors. Once you and others are safe and you have shared the issue with your manager, please then report it to EHS@ncratleos.com (safety issues) or using the [Resolver tool](#) (security issues).

EXPLORE MORE

 [CMP#219](#) is our drug-free workplace policy



Gifts and contributions

Occasional gifts that do not risk creating an actual or apparent conflict of interest or violate anti-bribery or anti-corruption laws and regulations are permitted. Generally, you may only receive and give gifts that are infrequent, modest in value, consistent with local business practices and reported accurately in our books and records.

You may not solicit gifts, give or receive gifts in exchange for anything in return, or give or receive extravagant or lavish gifts. All gifts must be permitted by our Conflict-of-Interest Policy, Standards for Business Conduct Policy and Gifts & Entertainment Policy.



These policies and rules apply to, **“anything of value”**, a term that is much broader than what we typically think of as gifts. It can include loans, donations to favored charities and access to confidential information.

EXPLORE MORE

[CMP#912](#) speaks about how to handle gifts and entertainment related situations in the workplace



Governmental employees, gifts and charitable contributions

Giving gifts to and receiving gifts from governmental officers and employees is subject to additional rules. You must receive prior written approval from the Legal department and Government Relations department before making or accepting any such gift and prior to contributing or donation to any political parties, activities, or initiatives using company funds or other company property



All gifts and donations to charitable organizations require prior written approval from the NCR Atleos Foundation.



Human rights

We strictly prohibit human trafficking and forced labor of any type, including, but not limited to, sex trafficking, debt bondage, forced prison labor and child labor.

We do not permit:

- The hiring of individuals below the legal working age
- The performance of dangerous work by workers under 18 years of age
- Corporal punishment and the threat of corporal punishment
- Requirements for worker deposits, retaining employee identity or immigration documentation and any other action that could restrict employees from freely terminating their employment

We are striving to:

- Provide fair compensation to all employees, officers and directors that meet, or exceed, minimum standards set by applicable law, including the payment of overtime wages
- Cap daily and weekly working hours at or below limits set by applicable law, ensuring that all overtime is reasonable and achieving work-life balance
- Respect employees’ rights to freedom of association and collective bargaining to the full extent provided by law
- Use internal and external recruiters with sufficient training to support compliance with this Code

EXPLORE MORE

 [CMP#927 is our human rights policy](#)



Social media

Special care should be taken when using social media, professionally or personally, when your account is associated with NCR Atleos. While NCR Atleos employees are free to express their thoughts and opinions, remember that your activity can impact NCR Atleos and its reputation. Social media activity that violates your confidentiality obligations or negatively impacts NCR Atleos' reputation may result in disciplinary action.

For more information, visit the [social media](#) page on Bridge. We want you to be active on social media!



Use good judgement: Nothing is truly private, no matter what your privacy settings are, so simply do not post something that you would not want your employer to see, including anything about NCR Atleos that is confidential.



Disclose affiliation:

If employees talk about NCR Atleos on social media, they MUST disclose their relationship with NCR Atleos on their profile or in the post—this is required by law.



Resources

This Code is our guide and point of reference for upholding our shared principles. It sets forth minimum standards for how we express our principles while conducting business. It is not an employment contract. It does not cover every requirement of our internal policies, legal and regulatory obligations or local rules or procedures.

If you have any questions about your ethical obligations, you should raise them with the Ethics & Compliance Office.

You can contact the NCR Atleos Ethics & Compliance Office in three ways.

All methods are available on a 24x7 basis:

- 1. Make a web-based Alert Line report.** Click on the AlertLine link to access the site of our third-party AlertLine provider. The site will instruct you on how to make a web-based report and will also allow you to submit attachments with your report.
- 2. Call the Alert Line.** You may contact NCR Atleos' third-party Alert Line provider over the phone. The Alert Line supports many languages.
 - **In the U.S.:** Call toll-free 1-844-539-2243.
 - **All other countries:** Call the applicable phone number for your country, [as listed here](#).
- 3. Send an e-mail directly to the Ethics & Compliance mailbox at ComplianceOffice.Ethics@ncratleos.com.**
This method is often appropriate for questions about how to apply an NCR Atleos policy.