

## CORPORATE MANAGEMENT POLICY MANUAL

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Human Rights		927	1 of 4
		Release No.	Current Release Date
		1	03-22-2024
Scope	Initial Release Date	Approved By	
Worldwide	03-22-2024	Ricardo Nunez, EVP, General counsel & Secretary	
		Organization	
		Legal	

### POLICY PERSPECTIVE

As a global corporation NCR Atleos is committed to doing business in a manner that complies with applicable law and respects human rights wherever we operate. We conduct business consistent with the Ten Principles of the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights and are committed to doing our part to develop, maintain and improve systems and processes that are designed to eliminate human rights violations in our internal operations and throughout our supply chain.

### POLICY

NCR Atleos is committed to developing, maintaining, and improving systems and processes to identify, prevent, mitigate, and remediate human rights violations related to NCR internal operations and throughout our supply chain. NCR directors, officers, employees, contractors, agents, and any other person representing or acting on behalf of NCR must conduct themselves in accordance with NCR policy and the law and must promptly report any concerns related to suspected violations of this Policy, whether by NCR Atleos or an NCR Atleos business partner. Further, NCR Atleos expects that its suppliers will adopt systems and processes that meet the requirements set forth in this policy and applicable law.

### POLICY STATEMENTS

#### 1. Human Rights

- 1.1. NCR Atleos respects the protection of internationally proclaimed human rights and is committed to developing, maintaining, and improving systems and processes to identify, prevent, mitigate, and remediate human rights violations within our internal operations and throughout our supply chain. This commitment is embodied in our Shared Values, our Code of Conduct and our policies that support human rights in the workplace, such as our policies related to non-discrimination and equal employment opportunity, anti-harassment, and employee data privacy.
- 1.2. NCR Atleos recognizes that certain groups, including women and minorities, may be at greater risk of human rights violations. NCR Atleos does not permit any form of discrimination or harassment based on race, color, ancestry, religion, creed, national origin, gender, gender identity or expression, sex, age, disability (physical or mental), sexual orientation, marital status, pregnancy, medical condition, genetic information, or any other basis protected by law.
- 1.3. NCR Atleos provides multiple channels for employees to raise grievances or concerns about respect and human rights in the workplace, including HR Central and the AlertLine.



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- 1.4. NCR Atleos personnel violating this policy may be subject to disciplinary action, including termination. NCR may terminate its relationship with suppliers that violate this policy.

## **2. Fair Labor Principles**

- 2.1. NCR Atleos recognizes the important role that our employees play in the company's success. We believe that open and candid communication among employees at all levels is an important part of providing a positive working environment for our employees. Although NCR believes the most effective means of resolving employee concerns is through direct communication and does not believe that third-party involvement in the employment relationship is necessary, NCR respects and fully complies with all applicable laws concerning the rights of our employees, including where applicable the right to engage in collective bargaining, and the right to associate freely with third-party organizations.
- 2.2. NCR Atleos does not condone human trafficking or forced or compulsory labor of any type, including but not limited to sex trafficking, debt bondage, child labor or forced prison labor. NCR requires that prospective workers be apprised of the salient terms of their employment with NCR during the hiring process, including their job duties, compensation, and benefits. NCR does not permit corporal punishment or the threat of corporal punishment in the workplace, nor do we prohibit employees from terminating their employment with NCR.
- 2.3. NCR Atleos does not hire individuals below the legal working age, and workers under 18 years of age should not perform dangerous work.
- 2.4. At NCR we celebrate diversity and do not tolerate illegal employment discrimination. Please refer to Corporate Management Policy 701 for a more comprehensive statement regarding NCR Atleos' non-discrimination policy and the steps the company takes to eliminate illegal discrimination in the workplace.

## **3. Due Diligence and Risk Assessment**

- 3.1. NCR's Internal Audit, Enterprise Risk, Third-Party Risk Management and Ethics & Compliance functions conduct audits, due diligence, and risk assessments to monitor and mitigate human rights risk.

## **4. Expectations for our Supply Chain**

- 4.1. NCR expects its suppliers, within their respective organizations and throughout their supply chains, to support internationally proclaimed human rights; to conduct due diligence and develop, implement, and maintain systems and practices that promote fair labor and environmental sustainability. We expect that our suppliers' practices will be consistent with these policy statements and meet, at a minimum, applicable legal requirements and industry standards.

## **5. Policy Review**



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- 5.1. This Policy will be reviewed and updated, as applicable, at the direction of NCR Atleos' General Counsel or Chief Compliance Officer.

## **REFERENCES / RESOURCES**

Ten Principles of the United Nations Global Compact  
UN Guiding Principles on Business and Human Rights

**This policy should be read in conjunction with**

Code of Conduct

CMP701 -Non-Discrimination – Equal Employment Opportunity

CMP702 -Harassment



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## REVISION HISTORY

Release	Release Date	Drafted by	Approved by	Comments
1	03-22-2024	S Johnson	R Nunez	New release
2				
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