

**Resolutions in Writing of the Directors of  
Cardtronics Canada Holdings Inc. (the  
“Corporation”) pursuant to Section  
117(1) of the *Business Corporations Act*  
(Alberta), effective May 24, 2024.**

**WHEREAS** the Corporation and certain of its Canadian affiliates is subject to the *Fighting Against Forced Labour and Child Labour Supply Chains Act*, SC 2023, c.9 (the “**Act**”);

**AND WHEREAS** a compliance report and questionnaire in relation to the Corporations most recent fiscal year (ended December 31, 2023) are required to be filed by May 31, 2024;

**NOW THEREFORE BE IT RESOLVED THAT:**

**APPROVAL OF REPORT AND QUESTIONNAIRE**

1. The report, in the form attached hereto as Schedule “A” (the “**Report**”), is hereby approved by the directors of the Corporation (on behalf of itself and the affiliates named in the Report), and any one director is hereby authorized and directed to sign the attestation set out in the Report and to file the Report with the Canadian Minister of Public Safety as required by Public Safety Canada.
2. The questionnaire, in the form attached hereto as Schedule “B” (the “**Questionnaire**”), is hereby approved by the directors of the Corporation (on behalf of itself and the affiliates named in the Report), and any one director is hereby authorized and directed to file the Questionnaire with the Canadian Minister of Public Safety as required by Public Safety Canada.

**GENERAL**

The foregoing resolutions may be executed in as many counterparts as are necessary and all counterparts together shall constitute the resolutions. Signatures sent by facsimile or other electronic transmission shall and do hereby constitute valid approval of the resolutions.

The foregoing resolutions are consented to in writing by the directors of the Corporation pursuant to subsection 117(1) of the *Business Corporation Act* (Alberta), as evidenced by the signatures below.

  
\_\_\_\_\_  
**GIOVANNI LOCANDRO**

  
\_\_\_\_\_  
**DAVID BOLTON**

## Schedule “A”

### REPORT UNDER THE *FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR SUPPLY CHAINS ACT, 2023*

#### **A. Introduction**

This report, made pursuant to section 11 of the *Fighting Against Forced Labour and Child Labour Supply Chains Act*, SC 2023, c.9 (the “Act”), is made jointly by the following affiliated entities (collectively, “Cardtronics Canada”): (i) Cardtronics Canada Holdings Inc., (ii) Cardtronics Canada, Ltd., (iii) Cardtronics Canada Operations Inc., (iv) Cardtronics Canada Limited Partnership, (v) Cardtronics Canada ATM Processing Partnership and (vi) Cardtronics Canada ATM Management Partnership. Pursuant to Section 13 of the Act, this report will be posted in a prominent place on the website of Cardtronics Canada.

This report is made in respect of the financial year ended December 31, 2023 and describes Cardtronics Canada, its supply chain and the steps taken by Cardtronics Canada to address Forced Labour. For the purposes of this report, forced labour (as defined in the Act) and child labour (as defined in the Act) shall together be defined as “Forced Labour”.

#### **B. Structure, Activities and Supply Chains**

##### **(i) Structure**

Each of the corporations and partnerships of Cardtronics Canada was formed pursuant to Alberta law. The Canadian head office of Cardtronics Canada is located in Mississauga, Ontario. The ultimate indirect shareholder of Cardtronics Canada is NCR Atleos Corporation, a NYSE publicly traded corporation (“NCR Atleos”). Cardtronics Canada employed approximately 500 persons in Canada.

##### **(ii) Activities**

Cardtronics Canada operates the following primary business lines across Canada:

- operating automated teller machines (“ATMs”);
- selling ATM hardware;
- licensing ATM software;
- provide ATM maintenance services;
- providing transaction processing services (including as an acquirer for ATMs); and
- providing debit card issuing and support services.

##### **(iii) Supply Chain**

Cardtronics Canada does not manufacture goods. Cardtronics Canada imports ATMs and related goods from its global affiliates (the “NCR Atleos Group”) and other suppliers. As a result, Cardtronics Canada has an indirect global supply chain of over 8,000 suppliers providing raw materials, service parts, internally and externally used goods and services, software, labour, and transportation and logistics. The NCR Atleos Group operates manufacturing facilities in India, Mexico, and Hungary.

**C. Steps Taken During The Previous Financial Year To Prevent And Reduce The Risk That Forced Labour Is Used At Any Step Of The Production Of Goods Imported Into Canada By Cardtronics Canada**

As part of the NCR Atleos Group, Cardtronics Canada is committed to conducting our business in a socially responsible manner and to operating in compliance with all applicable laws and regulations. In addition to Canada, the laws and regulations related to Forced Labour to which the NCR Atleos Group is subject include those in the United States, the United Kingdom, Europe and Australia. We do not tolerate the use of Forced Labour in our business or supply chain. Cardtronics Canada took the following steps in the previous financial year to reduce the risk that Forced Labour is used at any step of production of goods imported into Canada by Cardtronics Canada:

1. developed, reviewed and updated policies and compliance statement related to identifying, addressing and prohibiting the use of Forced Labour by Cardtronics Canada and the NCR Atleos Group;
2. continued to conduct employee training on Forced Labour (as described below);
3. continued to perform due diligence on suppliers in relation to the use of Forced Labour (as described below); and
4. gathered information on worker recruitment and maintained internal controls to ensure that all workers are recruited voluntarily.

Cardtronics Canada is committed to continuing to improve practices to reduce the risk of working with any organization that engages in the use of Forced Labour.

**D. Policies And Due Diligence Processes In Relation To Forced Labour**

**(i) Policies**

Relevant to this report, the NCR Atleos Group maintains a Code of Conduct, a Third Party Code of Conduct, a Human Rights Policy and a Modern Slavery Compliance Statement. These documents include prohibitions on the use of Forced Labour and represent our desire to engage with suppliers that have a shared commitment to our ethical, legal, and social business standards and values. The NCR Atleos Group (including Cardtronics Canada), in contracting with suppliers, generally requires its suppliers to comply with applicable laws and comply with our Third Party Code of Conduct (or their own code of conduct consistent with our Third Party Code of Conduct).

**(ii) Due Diligence on Suppliers**

Our 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.

As part of the supplier approval process of the NCR Atleos Group, an Onboarding Questionnaire must be completed for each supplier. This includes a multi-factor risk review of the use of Forced Labour by such supplier. If any responses to the Onboarding Questionnaire raise concerns, these are escalated to procurement senior management for review and resolution before the supplier is permitted to work with NCR Atleos.

Post-onboarding, if we identify items of significant non-compliance in respect of a supplier, 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. The NCR Atleos Group is in the process of developing a plan for the re-assessment of existing suppliers.

### **(iii) Due Diligence on Employees**

NCR Atleos maintains comprehensive employment practices and procedures designed to prevent the use of Forced Labour. 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.

### **(iv) Reporting**

Our employees are encouraged to speak up and report any concerns of wrongdoing via the multiple avenues provided to report their concerns (including pursuant to a whistleblowing policy). Employees can report concerns to their management teams, local human resources or legal departments, and an organization-wide Ethics and Compliance Office. We also make available an alert line whereby employees can report concerns anonymously. We do not tolerate retaliation against individuals who make good faith reports of misconduct, including reports of potential violations of policies or our commitment to fight the use of Forced Labour in our supply chains.

### **(v) Auditing**

The NCR Atleos Group maintains 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 its policies and procedures.

**E. Parts of Business and Supply Chains that Carry a Risk of Forced Labour Being Used and the Steps Taken to Assess and Manage that Risk**

Based on the review of supplier Onboarding Questionnaires, Cardtronics Canada has not identified any suppliers or supply chains that carry of risk of Forced Labour.

Generally, the areas in our supply chain with the lowest risk are areas where operations are handled by staff directly employed by the NCR Atleos Group. Suppliers that use subcontractors are identified as a higher risk than suppliers that do not use subcontractors. Increased scrutiny is applied during reviews of such suppliers.

**F. Measures Taken To Remediate Any Forced Labour**

Not Applicable - we are not aware of any instances of the use of Forced Labour in the supply chain of Cardtronics Canada during the applicable financial year.

**G. Measures Taken To Remediate The Loss Of Income To The Most Vulnerable Families That Results From Any Measure Taken To Eliminate The Use Of Forced Labour In Its Activities And Supply Chains**

Not Applicable - we are not aware of any instances of the use of Forced Labour in the supply chain of Cardtronics Canada during the applicable financial year.

**H. Training Provided to Employees on Forced Labour**

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

**I. Assessment Of Cardtronics Canada's Effectiveness In Ensuring That Forced Labour Is Not Being Used In Its Business And Supply Chains**

We are in the process of establishing a method for the regular review and audit of the organization's policies and procedures, including those on Forced Labour. The NCR Atleos Group uses AlertLine to track grievances such as those related to the use of Forced Labour. We have not received any grievances related to Forced Labour to date.

**Approval and Attestation of Report**

This statement was approved by the Board of Directors of Cardtronics Canada Holdings Inc. and Cardtronics Canada, Ltd., as required pursuant to section 11(4)(b)(ii) of the Act, and is signed by Giovanni Locandro as a Director of both Cardtronics Canada Holdings Inc. and Cardtronics Canada, Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

**CARDTRONICS CANADA HOLDINGS  
INC. and CARDTORNICS CANADA, LTD.**

*G. Locandro*

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Name: Giovanni Locandro

Title: Director

I have authority to bind Cardtronics Canada  
Holdings Inc. and Cardtronics Canada Ltd.

## Schedule “B”

### Questionnaire

#### Identifying Information

**1. \*This report is for which of the following? (Required)**

- Entity

**2. \*Legal name of reporting entity or government institution (Required)**

The report is being submitted for the following affiliated entities (collectively, “Cardtronics Canada”):

- Cardtronics Canada Holdings Inc.
- Cardtronics Canada, Ltd.
- Cardtronics Canada Operations Inc.
- Cardtronics Canada Limited Partnership
- Cardtronics Canada ATM Processing Partnership
- Cardtronics Canada ATM Management Partnership

**3. \*Financial reporting year (Required)**

- 2023

**4. \*Is this a revised version of a report already submitted this reporting year? (Required)**

- No

**5. Business number(s) (if applicable):**

In the same order as the Entities in Question 2.

- 819328204
- 819844077
- 857966709
- 829843440
- 887968907
- 887919801

**6. \*Is this a joint report? (Required)**

Yes

**6.1 \*If yes, identify the legal name of each entity covered by this report. (Required)**

- Cardtronics Canada Holdings Inc.
- Cardtronics Canada, Ltd.
- Cardtronics Canada Operations Inc.
- Cardtronics Canada Limited Partnership

- Cardtronics Canada ATM Processing Partnership
- Cardtronics Canada ATM Management Partnership

6.2 Identify the business number(s) of each entity covered by this report (if applicable).

- 819328204
- 819844077
- 857966709
- 829843440
- 887968907
- 887919801

**7. \*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)**

- No

**8. \*Which of the following categorizations applies to the entity? Select all that apply. (Required)**

- Canadian business presence (select all that apply):
  - **Has a place of business in Canada**
  - **Does business in Canada**
  - **Has assets in Canada**
- Meets size-related thresholds (select all that apply):
  - **Has at least \$20 million in assets for at least one of its two most recent financial years**
  - **Has generated at least \$40 million in revenue for at least one of its two most recent financial years**
  - **Employs an average of at least 250 employees for at least one of its two most recent financial years**

**9. \*Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)**

- **Other services (except public administration)**
- **Other, please specify: Cardtronics Canada operates, maintains and sells automated teller machines, related services and provides transaction processing services.**

**10. \*In which country is the entity headquartered or principally located? (Required)**

- Canada

10.1 If in Canada: \*In which province or territory is the entity headquartered or principally located? (Required)

- Headquartered in Ontario

## Annual Report

1. **\*What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)**

- **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily**
- **Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains**
- **Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains**
- **Developing and implementing child protection policies and processes**
- **Developing and implementing anti-forced labour and/or -child labour contractual clauses**
- **Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists**
- **Developing and implementing grievance mechanisms**
- **Developing and implementing training and awareness materials on forced labour and/or child labour**

2. **Please provide additional information describing the steps taken (if applicable) (1,500 character limit).**

Cardtronics Canada also:

- continued to conduct employee training on Forced Labour;

3. **\*Which of the following accurately describes the entity's structure? (Required)**

- **Corporation, Trust, Partnership or Other unincorporated organization**

4. **\*Which of the following accurately describes the entity's activities? Select all that apply. (Required)**

- **Selling goods**
  - **in Canada**
- **Distributing goods**
  - **in Canada**
- **Importing into Canada goods produced outside Canada**

**6. Please provide additional information on the entity’s structure, activities and supply chains (1,500 character limit).**

**Structure**

Each of the corporations and partnerships of Cardtronics Canada was formed pursuant to Alberta law. The Canadian head office of Cardtronics Canada is located in Mississauga, Ontario. The ultimate indirect shareholder of Cardtronics Canada is NCR Atleos Corporation, a NYSE publicly traded corporation (“NCR Atleos”). Cardtronics Canada employed approximately 500 persons in Canada.

**Activities**

Cardtronics Canada operates the following primary business lines across Canada:

- operating automated teller machines (“ATMs”);
- selling ATM hardware;
- licensing ATM software;
- provide ATM maintenance services;
- providing transaction processing services (including as an acquirer for ATMs); and
- providing debit card issuing and support services.

**Supply Chain**

Cardtronics Canada does not manufacture goods. Cardtronics Canada imports ATMs and related goods from its global affiliates (the “NCR Atleos Group”) and other suppliers. As a result, Cardtronics Canada has an indirect global supply chain of over 8,000 suppliers providing raw materials, service parts, internally and externally used goods and services, software, labour, and transportation and logistics. The NCR Atleos Group operates manufacturing facilities in India, Mexico, and Hungary.

**6. \*Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)**

- Yes

**6.1 \*If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)**

- **Embedding responsible business conduct into policies and management systems**
- **Identifying and assessing adverse impacts in operations, supply chains and business relationships**

7. Please provide additional information on the entity’s policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

**8. \*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)**

- **Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.**

**8.1 \*If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)**

- **The use of outsourced, contracted or subcontracted labour**

**9. \*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)**

- **None of the above**

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

**11. \*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)**

- **Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.**

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

**13. \*Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)**

- **Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.**

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).

**15. \*Does the entity currently provide training to employees on forced labour and/or child labour? (Required)**

- **Yes**

**15.1 \*If yes, is the training mandatory? (Required)**

- **Yes, the training is mandatory for all employees.**

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

**17. \*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)**

No

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).**

We are in the process of establishing a method for the regular review and audit of the organization's policies and procedures, including those on Forced Labour. The NCR Atleos Group uses AlertLine to track grievances such as those related to the use of Forced Labour. We have not received any grievances related to Forced Labour to date.

**Resolutions in Writing of the Directors of  
Cardtronics Canada, Ltd. (the  
"Corporation") pursuant to Section  
117(1) of the *Business Corporations Act*  
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\_\_\_\_\_  
**GIOVANNI LOCANDRO**

  
\_\_\_\_\_  
**DAVID BOLTON**

## Schedule “A”

### REPORT UNDER THE *FIGHTING AGAINST FORCED LABOUR AND CHILD LABOUR SUPPLY CHAINS ACT, 2023*

#### **A. Introduction**

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##### **(i) Structure**

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**C. Steps Taken During The Previous Financial Year To Prevent And Reduce The Risk That Forced Labour Is Used At Any Step Of The Production Of Goods Imported Into Canada By Cardtronics Canada**

As part of the NCR Atleos Group, Cardtronics Canada is committed to conducting our business in a socially responsible manner and to operating in compliance with all applicable laws and regulations. In addition to Canada, the laws and regulations related to Forced Labour to which the NCR Atleos Group is subject include those in the United States, the United Kingdom, Europe and Australia. We do not tolerate the use of Forced Labour in our business or supply chain. Cardtronics Canada took the following steps in the previous financial year to reduce the risk that Forced Labour is used at any step of production of goods imported into Canada by Cardtronics Canada:

1. developed, reviewed and updated policies and compliance statement related to identifying, addressing and prohibiting the use of Forced Labour by Cardtronics Canada and the NCR Atleos Group;
2. continued to conduct employee training on Forced Labour (as described below);
3. continued to perform due diligence on suppliers in relation to the use of Forced Labour (as described below); and
4. gathered information on worker recruitment and maintained internal controls to ensure that all workers are recruited voluntarily.

Cardtronics Canada is committed to continuing to improve practices to reduce the risk of working with any organization that engages in the use of Forced Labour.

**D. Policies And Due Diligence Processes In Relation To Forced Labour**

**(i) Policies**

Relevant to this report, the NCR Atleos Group maintains a Code of Conduct, a Third Party Code of Conduct, a Human Rights Policy and a Modern Slavery Compliance Statement. These documents include prohibitions on the use of Forced Labour and represent our desire to engage with suppliers that have a shared commitment to our ethical, legal, and social business standards and values. The NCR Atleos Group (including Cardtronics Canada), in contracting with suppliers, generally requires its suppliers to comply with applicable laws and comply with our Third Party Code of Conduct (or their own code of conduct consistent with our Third Party Code of Conduct).

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**F. Measures Taken To Remediate Any Forced Labour**

Not Applicable - we are not aware of any instances of the use of Forced Labour in the supply chain of Cardtronics Canada during the applicable financial year.

**G. Measures Taken To Remediate The Loss Of Income To The Most Vulnerable Families That Results From Any Measure Taken To Eliminate The Use Of Forced Labour In Its Activities And Supply Chains**

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**H. Training Provided to Employees on Forced Labour**

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**I. Assessment Of Cardtronics Canada's Effectiveness In Ensuring That Forced Labour Is Not Being Used In Its Business And Supply Chains**

We are in the process of establishing a method for the regular review and audit of the organization's policies and procedures, including those on Forced Labour. The NCR Atleos Group uses AlertLine to track grievances such as those related to the use of Forced Labour. We have not received any grievances related to Forced Labour to date.

**Approval and Attestation of Report**

This statement was approved by the Board of Directors of Cardtronics Canada Holdings Inc. and Cardtronics Canada, Ltd., as required pursuant to section 11(4)(b)(ii) of the Act, and is signed by Giovanni Locandro as a Director of both Cardtronics Canada Holdings Inc. and Cardtronics Canada, Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

**CARDTRONICS CANADA HOLDINGS  
INC. and CARDTORNICS CANADA, LTD.**

*G. Locandro*

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Name: Giovanni Locandro

Title: Director

I have authority to bind Cardtronics Canada  
Holdings Inc. and Cardtronics Canada Ltd.

## Schedule “B”

### Questionnaire

#### Identifying Information

**1. \*This report is for which of the following? (Required)**

- Entity

**2. \*Legal name of reporting entity or government institution (Required)**

The report is being submitted for the following affiliated entities (collectively, “Cardtronics Canada”):

- Cardtronics Canada Holdings Inc.
- Cardtronics Canada, Ltd.
- Cardtronics Canada Operations Inc.
- Cardtronics Canada Limited Partnership
- Cardtronics Canada ATM Processing Partnership
- Cardtronics Canada ATM Management Partnership

**3. \*Financial reporting year (Required)**

- 2023

**4. \*Is this a revised version of a report already submitted this reporting year? (Required)**

- No

**5. Business number(s) (if applicable):**

In the same order as the Entities in Question 2.

- 819328204
- 819844077
- 857966709
- 829843440
- 887968907
- 887919801

**6. \*Is this a joint report? (Required)**

Yes

**6.1 \*If yes, identify the legal name of each entity covered by this report. (Required)**

- Cardtronics Canada Holdings Inc.
- Cardtronics Canada, Ltd.
- Cardtronics Canada Operations Inc.
- Cardtronics Canada Limited Partnership

- Cardtronics Canada ATM Processing Partnership
- Cardtronics Canada ATM Management Partnership

6.2 Identify the business number(s) of each entity covered by this report (if applicable).

- 819328204
- 819844077
- 857966709
- 829843440
- 887968907
- 887919801

**7. \*Is the entity also subject to reporting requirements under supply chain legislation in another jurisdiction? (Required)**

- No

**8. \*Which of the following categorizations applies to the entity? Select all that apply. (Required)**

- Canadian business presence (select all that apply):
  - **Has a place of business in Canada**
  - **Does business in Canada**
  - **Has assets in Canada**
- Meets size-related thresholds (select all that apply):
  - **Has at least \$20 million in assets for at least one of its two most recent financial years**
  - **Has generated at least \$40 million in revenue for at least one of its two most recent financial years**
  - **Employs an average of at least 250 employees for at least one of its two most recent financial years**

**9. \*Which of the following sectors or industries does the entity operate in? Select all that apply. (Required)**

- **Other services (except public administration)**
- **Other, please specify: Cardtronics Canada operates, maintains and sells automated teller machines, related services and provides transaction processing services.**

**10. \*In which country is the entity headquartered or principally located? (Required)**

- Canada

10.1 If in Canada: \*In which province or territory is the entity headquartered or principally located? (Required)

- Headquartered in Ontario

## Annual Report

1. **\*What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity? Select all that apply. (Required)**

- **Gathering information on worker recruitment and maintaining internal controls to ensure that all workers are recruited voluntarily**
- **Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in the organization's activities and supply chains**
- **Requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains**
- **Developing and implementing child protection policies and processes**
- **Developing and implementing anti-forced labour and/or -child labour contractual clauses**
- **Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists**
- **Developing and implementing grievance mechanisms**
- **Developing and implementing training and awareness materials on forced labour and/or child labour**

2. **Please provide additional information describing the steps taken (if applicable) (1,500 character limit).**

Cardtronics Canada also:

- continued to conduct employee training on Forced Labour;

3. **\*Which of the following accurately describes the entity's structure? (Required)**

- **Corporation, Trust, Partnership or Other unincorporated organization**

4. **\*Which of the following accurately describes the entity's activities? Select all that apply. (Required)**

- **Selling goods**
  - **in Canada**
- **Distributing goods**
  - **in Canada**
- **Importing into Canada goods produced outside Canada**

**6. Please provide additional information on the entity’s structure, activities and supply chains (1,500 character limit).**

**Structure**

Each of the corporations and partnerships of Cardtronics Canada was formed pursuant to Alberta law. The Canadian head office of Cardtronics Canada is located in Mississauga, Ontario. The ultimate indirect shareholder of Cardtronics Canada is NCR Atleos Corporation, a NYSE publicly traded corporation (“NCR Atleos”). Cardtronics Canada employed approximately 500 persons in Canada.

**Activities**

Cardtronics Canada operates the following primary business lines across Canada:

- operating automated teller machines (“ATMs”);
- selling ATM hardware;
- licensing ATM software;
- provide ATM maintenance services;
- providing transaction processing services (including as an acquirer for ATMs); and
- providing debit card issuing and support services.

**Supply Chain**

Cardtronics Canada does not manufacture goods. Cardtronics Canada imports ATMs and related goods from its global affiliates (the “NCR Atleos Group”) and other suppliers. As a result, Cardtronics Canada has an indirect global supply chain of over 8,000 suppliers providing raw materials, service parts, internally and externally used goods and services, software, labour, and transportation and logistics. The NCR Atleos Group operates manufacturing facilities in India, Mexico, and Hungary.

**6. \*Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour? (Required)**

- Yes

**6.1 \*If yes, which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? Select all that apply. (Required)**

- **Embedding responsible business conduct into policies and management systems**
- **Identifying and assessing adverse impacts in operations, supply chains and business relationships**

7. Please provide additional information on the entity’s policies and due diligence processes in relation to forced labour and child labour (if applicable) (1,500 character limit).

**8. \*Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used? (Required)**

- **Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.**

**8.1 \*If yes, has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? Select all that apply. (Required)**

- **The use of outsourced, contracted or subcontracted labour**

**9. \*Has the entity identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries? Select all that apply. (Required)**

- **None of the above**

10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable) (1,500 character limit).

**11. \*Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains? (Required)**

- **Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.**

12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable) (1,500 character limit).

**13. \*Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains? (Required)**

- **Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.**

14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable) (1,500 character limit).

**15. \*Does the entity currently provide training to employees on forced labour and/or child labour? (Required)**

- **Yes**

**15.1 \*If yes, is the training mandatory? (Required)**

- **Yes, the training is mandatory for all employees.**

16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable). (1,500 character limit).

**17. \*Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Required)**

No

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable). (1,500 character limit).**

We are in the process of establishing a method for the regular review and audit of the organization's policies and procedures, including those on Forced Labour. The NCR Atleos Group uses AlertLine to track grievances such as those related to the use of Forced Labour. We have not received any grievances related to Forced Labour to date.