

Diebold Nixdorf Canada Limited Report on the measures taken to prevent and reduce the risk that forced labor or child labor.

A. STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Structure

Reporting entity's legal name: Diebold Nixdorf Canada Limited

Financial reporting year: January – December 2025

Identification of a revised report: First report.

Business number(s), if applicable: 123321341

Identification of reporting obligations in other jurisdictions: Diebold Nixdorf Canada Limited doesn't have reporting obligations in other jurisdictions.

Entity categorization according to the Act: Corporation

Sector/industry: Private Sector / Sales to Financial and retail technology industry.

Location: Ontario, Canada

DIEBOLD NIXDORF CANADA LIMITED (Diebold Nixdorf Canada) is a corporation registered under the Governing Jurisdiction of Canada – Ontario. Diebold Nixdorf Canada's parent company is Diebold Nixdorf, Inc. a US corporation listed on the New York Stock Exchange.

Diebold Nixdorf Canada is overseen and managed by its parent company Diebold Nixdorf Inc.'s Executive Leadership Team consisting of an Executive Vice President and Chief Financial Officer, an Executive Vice President, Global Banking, an Executive Vice President, Global Retail, an Executive Vice President, Operational Excellence, an Executive Vice President, Chief Legal Officer & Corporate Secretary, a Sr Vice President & Chief Information Officer, a Chief People Officer, and a Vice President, Chief Ethics and Compliance Officer.

[Leadership | Diebold Nixdorf](#)

Diebold Nixdorf Canada has a workforce of approximately 362 employees.

Activities

Diebold Nixdorf Canada imports banking and retail technology products for sale to, and use by, financial institutions and retail customers across Canada. These products are used in support of retail and banking transactions nationwide. For example, Diebold Nixdorf Canada supplies automated teller machines (ATMs) to banks and point-of-sale (POS) equipment to retailers. In addition to hardware, the company

also provides the associated software solutions and technical services required to operate, maintain, and support these systems.

Diebold Nixdorf Canada offers a comprehensive portfolio of solutions designed to support the automation, digitization, and transformation of banking and retail operations. Its activities are structured around two primary customer segments—**Banking** and **Retail**—reflecting the markets it serves.

Through an integrated combination of hardware, software, and services, Diebold Nixdorf Canada enables customers to select and deploy solutions that meet their operational requirements and business objectives. These offerings are designed to deliver scalable, flexible, and reliable value across customers' organizations.

Supply Chain

Diebold Nixdorf Canada imports banking and retail products for sale to and use by banks and retailers throughout Canada. Diebold Canada Limited relies on its parent company Diebold Nixdorf's global supply chain resources and processes to source finished products, components, software, and other goods needed to support sales activities as well as to repair, upgrade, or integrate solutions for end customers.

A significant portion of its imports consists of automated teller machines assembled by its parent company Diebold Nixdorf Inc.'s subsidiaries in Germany, by Diebold Nixdorf Inc. in the United States and a small portion by a Diebold Nixdorf Inc.'s contract manufacturer in India.

Diebold Nixdorf Canada also imports retail point-of-sale equipment assembled by affiliated subsidiaries in Germany.

In addition, as part of its multinational operations, the company imports components and spare parts primarily from related entities in the United States, along with goods originating from Diebold Nixdorf facilities and third-party suppliers across Europe, North America, and Asia. These imported components are used to support servicing, upgrading, and integration of banking and retail solutions provided to Canadian customers.

B. POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Company Policies

Diebold Nixdorf maintains a framework of policies that support its commitment to preventing and reducing the risk of forced labour and child labour in its operations and supply chains. The [Code of Business Ethics](#) establishes the baseline expectations for ethical conduct and reflects the company's commitment to internationally recognized labour, human rights, and environmental standards.

The company's **Modern Slavery Policy**, which was reviewed in 2025 by the company Policy Committee, explicitly prohibits the use of forced labour, child labour, human trafficking, and other forms of exploitation. Prohibited practices include, but are not limited to, the withholding of identity documents, deposits or wages, excessive or involuntary overtime, and inappropriate loans or salary advances that may restrict workers' freedom or create dependency on employment.



Diebold Nixdorf's **Global Human Rights Policy** formalizes its well-established efforts and continuing commitment to support the human rights of all people across its global operations and supply chains, consistent with the **United Nations Guiding Principles on Business and Human Rights**. This Policy provides a framework for the identification and assessment of human rights risks, the mitigation and management of risks, and the reporting and remediation of grievances if they occur in Diebold Nixdorf's operations and throughout its supply chain. The purpose of the Policy is for Diebold Nixdorf to support the growth of human rights initiatives globally through its own actions.

To communicate expectations to third parties, Diebold Nixdorf conducts an **annual review of its [Supplier Code of Conduct \(SCOC\)](#)**. The SCOC outlines requirements related to human rights, labour standards, modern slavery, and sustainability, and is updated as necessary to align with evolving legal, regulatory, and best-practice standards. The SCOC is based upon the fundamental rights and standards of treatment as set out in the **Universal Declaration of Human Rights**, the **International Covenant on Civil and Political Rights**, the **International Covenant on Economic, Social and Cultural Rights**, the **OECD Guidelines for Multinational Enterprises**, and the **International Labour Organization's Declaration on Fundamental Principles and Rights at Work**.

Additional policies supporting the prevention of forced labour and child labour include the:

- Third Party Policy
- Whistleblower and Non-Retaliation Policy
- Global Environmental, Health and Safety Policy
- [Global Sustainability Policy](#)
- Global Diversity, Inclusion and Sensitivity Policy
- Equal Employment Opportunity Policy
- Conflict Minerals Policy

These policies apply to all officers, directors, employees, and contingent workers.

All policies are reviewed and approved by senior management through Diebold Nixdorf's **Global Policy Committee** and are made available to employees via the company's internal policy portal. Certain policies are also publicly available on www.dieboldnixdorf.com. Policies are **reviewed on an annual basis** to ensure continued alignment with applicable laws, regulations, and recognized best practices.

Supply Chain Due Diligence

Diebold Nixdorf has procedures to assess and manage risks in our supply chain.

Since 2017, all our potential new suppliers have been set up and screened in our due diligence screening tool before being onboarded as a supplier.

As part of that screening process, the supplier must answer, for example, questions about the use of forced labor in its operations. If the supplier responds in a way that alerts us to a potential risk, then enhanced due diligence would take place.

Diebold Nixdorf Supplier Code of Conduct sets out our sustainability requirements. Suppliers must agree to accept our Code on onboarding or in their contracts with us unless they can demonstrate that they have an equivalent code of conduct.

We have an enhanced questionnaire which is sent to all suppliers in the higher risk categories (based on our risk analysis as described above) to obtain further assurance about their commitment to our human rights and environmental principles. This questionnaire is now an integral part of our annual risk analysis.

We have an audit program for our key suppliers. Typically, these are carried out by Diebold Nixdorf people and are scheduled with the supplier. Twenty-nine audits were undertaken in 2025. Where we consider a supplier to be in a higher risk category from a modern slavery or human rights perspective, we are building into our audits questions to ensure we understand the reality of working conditions. If we have concerns, then we will put in place measures and track progress against the plan. If a supplier does not make the necessary improvements, then we may cancel the contract.

For several years, we have carried out due diligence to ensure that conflict minerals are not used in our supply chain by seeking reassurances from those direct suppliers where we perceive there may be a greater risk. This process continued in 2025.

If it is determined that there is a risk that the activities of our suppliers are causing or contributing to negative human rights or environmental impacts, we have a process in place to assess, modify, stop and/or correct the activity.

In 2026 we are reinforcing our supplier risk management by introducing a new tool which will screen suppliers as part of onboarding and suppliers will then be subject to continuous risk assessment. Environmental, Social and Governance risks will be identified as part of this screening and continuous risk management process.

C. PARTS OF OUR BUSINESS AND SUPPLY CHAIN THAT CARRY A RISK OF FORCED LABOR OR CHILD LABOR TO BE USED AND THE STEPS TAKEN TO ASSESS AND MITIGATE THAT RISK

Our own workforce.

We consider the risk of modern slavery within our own operations to be low as most of our people are highly skilled, and we have standardized global recruitment policies that we monitor carefully. In our own facilities, we adhere to labor standards, and our parent company Diebold Nixdorf Inc. works with its joint venture partner and contract manufacturer to ensure they do the same. All our employees and contingent workers are required to complete online COBE training upon joining the company and annually thereafter. This includes signing and agreeing to comply with our COBE Policy. In 2021, we included a module on modern slavery as part of our COBE training. We also intend to introduce more focused training on modern slavery to our Procurement and Supply Chain teams to help them spot the signs of forced labor and identify where to report concerns. Our aim is to share practical case studies and demonstrate the day-to-day steps to prevent modern slavery in our business and supply chain.

Our Supply Chain

Based on our risk assessment, we have not identified material risks of forced labor or child labor within our supply chains. This reflects the nature of the products manufactured by our parent company, which are generally associated with a low inherent risk profile. Nevertheless, we acknowledge that risks may increase further upstream in the supply chain, even where processes and procedures are in place, as Diebold Nixdorf does not directly control all upstream operations. To address this, we require our direct suppliers to conduct appropriate due diligence on their own suppliers.

Diebold Nixdorf Canada's suppliers are considered an extension of our business. Accordingly, all suppliers are expected to comply with applicable laws and regulations in their jurisdictions and to uphold high standards of ethical conduct. We expect suppliers to respect human rights, promote diversity and good corporate citizenship, and meet or exceed environmental, health, and safety standards. Suppliers are also required to support a sustainable and transparent supply chain, including responsible mineral sourcing practices. Compliance with our Supplier Code of Conduct (SCOC) is mandatory.

Our socio-environmental expectations are reinforced through our Modern Slavery Policy, which expressly prohibits forced, bonded, and child labor. In addition, our parent company, Diebold Nixdorf, Inc., publishes an annual statement under the UK Modern Slavery Act, California Transparency in Supply Chain Act, the **Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act** and the German Act on Corporate Due Diligence Obligations in Supply Chains. The commitments and activities described therein apply to Diebold Nixdorf Canada and all subsidiaries worldwide.

We are committed to ensuring that human rights violations, including modern slavery, forced labor, and child labor—as well as environmental abuses, do not occur within our own operations or our supply chain. To support this commitment, we have implemented measures to identify, assess, prioritize, and document risks.

Our supply chain risk analysis begins with an evaluation of general country and sector risks. Using an external risk-assessment tool, we assess background human rights and environmental risks across jurisdictions worldwide and apply this analysis to our supplier base by considering suppliers' country of operation, product category, and annual spend with Diebold Nixdorf. Suppliers identified as higher risk through this process are subject to enhanced due diligence.

All prospective suppliers are subject to compliance screening prior to onboarding. This process includes a review of ethics and compliance programs and covers areas such as data privacy, modern slavery, forced and child labor, and diversity. Suppliers are required either to commit to our Code of Business Ethics (COBE) and related policies or to demonstrate that they maintain equivalent standards. We also request information from suppliers regarding ESG or sustainability disclosures to third-party organizations and invite them to participate in ESG surveys administered by Diebold Nixdorf. Where responses indicate potential risk, enhanced due diligence is undertaken. For certain strategic or higher-risk suppliers, audits may also be conducted.

Suppliers are evaluated on a regular basis, and the results are incorporated into departmental strategies and risk management processes. Through ongoing supplier engagement, performance reviews, and partnership-based collaboration, we aim to continuously improve supply chain performance and quality. By embedding sustainability principles throughout our supply chain, we seek to foster a strong, responsible network of partners and promote long-term, best-in-class supply chain practices.



Procurement practices in Supply Chain

In direct procurement (suppliers that deliver components for our products to our parent company's manufacturing locations), there are further evaluations in place. Annually we carry out due diligence to ensure that conflict minerals are not used in our supply chain by seeking reassurances from those direct suppliers where we perceive there may be a greater risk. We are also requiring suppliers which we perceive to be in a higher risk category in respect of human rights and the environment to complete an enhanced due diligence questionnaire ("CORPORATE RESPONSIBILITY IN THE SUPPLY CHAIN" questionnaire). If it is determined that there is a risk that the activities of our suppliers are causing or contributing to negative human rights or environmental impacts, we have a process in place to assess, modify, stop and/or correct the activity.

The specific policies can also be found on the Diebold Nixdorf website for suppliers, along with our global terms and conditions, <https://www.dieboldnixdorf.com/en-us/support/supplier-information>. Please see also our [ESG report](#).

Governance

Our program, to mitigate the risks of modern slavery and human rights violations and environmental risks occurring within our business or with our end-to-end supply chain is sponsored and fully supported by our parent company's Board of Directors.

Diebold Nixdorf has a Global Sustainability Council made up of senior managers across functions, including our Environmental, Health & Safety team; Ethics & Compliance; Human Resources; Procurement; Manufacturing and R&D; Internal Audit; and Legal. This Council monitors our progress to ensure we manage risk appropriately and ensure a zero tolerance for human rights violation and all associated risks and consequences throughout our business and downward supply chain. It develops KPIs to track progress.

D. Any measures taken to remediate any forced labour or child labour.

Not applicable as no incidents to remediate.

E. Any 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 or child labour in its activities and supply chains.

Not applicable as no incidents to remediate.

F. Training

All our employees and contingent workers are required to complete an online Code of Business Ethics training on joining and annually thereafter. This includes signing and agreeing to comply with our Code of Business Ethics policy.

Our aim is to ensure that every employee, including those who do not work directly with our suppliers, is aware of our supply chain responsibility processes so that they can react appropriately if necessary.



Procurement approval is required for all new suppliers, and we train Diebold Nixdorf procurement teams so they are equipped to spot any potential human rights or environmental concerns when onboarding a new supplier.

In 2025, in addition to the core training modules in our annual training, employees in Sales and Procurement roles, as well as employees with increased risk profiles in the context of international trade or supply chain activities, were required to complete further targeted training modules: “International Trade Compliance” and “Supply Chain Human Rights”.

Completion of these training courses was managed by the respective line managers and centrally documented.

G. How the entity assesses its effectiveness in ensuring that forced and child labor are not being used in its business and supply chains.

We measure the effectiveness of our actions by reviewing our supplier audit results, the closure time for corrective actions, and completion rates by high-risk suppliers of our enhanced questionnaire. Senior management, including the Global Sustainability Council, reviews these results to ensure ongoing improvement.

We have a [whistleblowing hotline](#) where Diebold Nixdorf people and third parties outside the company can raise any ethical concerns, including any concerns about human rights, modern slavery and environmental violations. If a concern is raised, it is investigated fully by our dedicated ethics and compliance professionals, and our regional Ethics Committees oversee and ultimately decide on any action required.

We also have a non-retaliation policy so that when our people raise a concern in good faith, they know, even if the concern ends up not being well – founded, that they will not be retaliated against.

Attestation:

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of Director and President of Diebold Nixdorf Canada Ltd., attest that I have reviewed the information contained in the report on behalf of the governing body of 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 within this report.

Full name: Jeannette Pacoli

Title: Controller, Director and President, Diebold Nixdorf Canada

Date May 13, 2026

Signature,



"I have the authority to bind 'Name of Entity.'"

