

# MODERN SLAVERY STATEMENT

## INTRODUCTION

NCR is the global leader in consumer transaction technologies, turning everyday interactions with businesses into exceptional experiences. With its software, hardware, and portfolio of services, NCR enables nearly 550 million transactions daily across the financial, retail, hospitality, travel, telecommunications and technology industries. NCR's global headquarters is located in the Atlanta, Georgia area in the United States. NCR does business in 180 countries through affiliates and partners. Within the United Kingdom, NCR operates through NCR Limited, headquartered in London, England, Radiant Systems Limited, headquartered in London England, and NCR Financial Solutions Group Limited, headquartered in Dundee, Scotland.

This Modern Slavery Statement is intended to convey the steps that NCR has taken that are designed to prevent the incidence of Modern Slavery in our own organisation and in our supply chain. When we use the term modern slavery in this document, we mean forced or coerced labour or domestic servitude of any type, child labour, and sex trafficking. This statement covers NCR's fiscal year ending December 31, 2016 and activities occurring from January – June 2017.

## COMBATTING MODERN SLAVERY WITHIN NCR

### NCR Establishes a Tone of Compliance

NCR's **Shared Values** and **Code of Conduct** demonstrate NCR's commitment to conducting business ethically and in accordance with applicable law in all countries in which NCR does business. NCR supports the Ten Principles of the UN Global Compact, and has adopted policies and procedures designed to support those principles. In 2016, NCR introduced a policy on human rights in the workplace, formally documenting NCR's strong position that modern slavery is not tolerated in its workplace or in its supply chain.

### NCR Trains Its Workforce

In the first quarter of each fiscal year, NCR requires all employees to complete a training and certification module on NCR's Code of Conduct and Shared Values. This training reviews, among other topics, NCR's policies related to anti-bribery and anti-corruption, data privacy, non-discrimination, fair employment practices, and detecting and addressing modern slavery. At the end of the training module, each employee is required to certify that he or she will comply with the NCR Code of Conduct, and to identify any concerns and exceptions so that they may be addressed. NCR is exploring plans to provide additional training to individuals within its organisation, such as supply chain managers, who may require more in-depth knowledge about recognising and addressing modern slavery.

### NCR Requires Its Workforce to Speak Up

NCR provides several avenues for its employees to raise concerns regarding potential violations of law and policy to management. As part of annual Code of Conduct training and certification, NCR employees are reminded of their obligation to speak up and report any concerns of wrongdoing and of the multiple avenues that NCR provides to report their concerns.

## **NCR Prohibits Retaliation**

NCR does not tolerate retaliation against individuals who make good faith reports of misconduct, including reports of potential violations of NCR's policies and practices against modern slavery, regardless of the reporting method they select.

## **NCR Maintains Robust Human Resources Practices**

NCR maintains comprehensive employment practices and procedures that are designed to comply with applicable law and NCR policy. These practices and procedures are implemented and managed by NCR's Human Resources department, and include the following:

- We pay employee wages that meet or exceed host country legal wage requirements.
- We hire only individuals who are lawfully permitted to work in the jurisdiction where they are employed.
- We explain key terms of employment to prospective employees during the hiring process, including wages and benefits; work location; living conditions and associated costs (if applicable); and whether the nature of the work is hazardous.
- We enter into employment contracts that contain, or we otherwise document, the salient terms of employment, including the pay rate and pay frequency in accordance with local law.
- We do not prohibit employees from terminating their employment with NCR.
- We do not destroy, conceal, confiscate or otherwise deny access by any employee to his or her identity or immigration documents.
- We have established programs for international work assignments that include provisions such as home visits, paid transportation to and from the home country, and reasonable living accommodations that meet or exceed host country housing and safety standards. Employees on international work assignments may choose to accept or decline the provisions offered by the company.

## **NCR Inspects Its Businesses**

In 2016, NCR enhanced its Internal Audit procedures to review our compliance with our Human Rights policy.

## **STEPS WE TAKE IN OUR SUPPLY CHAIN**

Below are some of the processes NCR has implemented that are designed to identify and, if found, eliminate modern slavery in its supply chain. We deem suppliers who provide manufactured products to us (for example, hardware or hardware components) to be the highest risk element in our supply chain with respect to this issue.

## **NCR Expects Its Suppliers to Conduct Business Ethically**

NCR expects that its suppliers will conduct business ethically and will comply with the law. NCR has historically required its suppliers to agree in their contracts with NCR that they will conduct business ethically and comply with applicable laws. NCR has adopted a **Supplier Code of Conduct** which is posted on our public website, which includes, among other things, a requirement to adhere to NCR's human rights policy, which prohibits modern slavery. NCR is in the process of updating

all of our procurement contract templates, including its forms of purchase order, to expressly mandate that our suppliers comply with the terms of our Supplier Code of Conduct.

### **NCR Completes Modern Slavery Due Diligence on Our High-Risk Suppliers**

NCR modified its RFP response templates to require suppliers that provide manufactured products to certify at the time of bid submittal that they conduct business ethically and will comply with the NCR Supplier Code of Conduct, or that the supplier maintains a code of conduct that is consistent with best-in-class business ethics codes and that contains provisions at least as restrictive as those in NCR's Supplier Code of Conduct, including the prohibition on modern slavery. Further, NCR requires suppliers to complete responses to due diligence questions as part of the supplier approval process to confirm compliance with the NCR Supplier Code of Conduct.

### **NCR Monitors Ongoing Behavior**

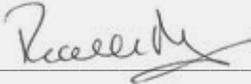
NCR conducts periodic business reviews with our top suppliers that provide manufactured products to review our business with them. As part of those reviews, which may be conducted at a supplier's facility, we require the suppliers to complete (or update) questionnaires about their practices in their own organisations and supply chains that are designed to detect and eliminate modern slavery.

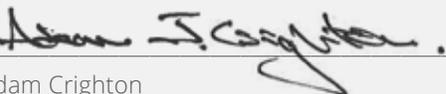
### **NCR Addresses Concerns**

If we identify items of significant non-compliance, we will address the issue with the supplier, seeking corrective action and improvement in the global ecosystem where possible.

### **BOARD APPROVAL**

This statement was reviewed and approved by the Board of Directors of NCR Limited on 22 June 2017, by NCR Financial Solutions Group Limited on 21 June 2017, and by Radiant Systems Limited on 16 June 2017. The Boards of Directors for these entities will review and update this statement on an annual basis.

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