

Modern Slavery Statement

INTRODUCTION

This Modern Slavery Statement, published pursuant to Section 54 of the Modern Slavery Act 2015, describes the steps that NCR has taken to address modern slavery in our 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 human trafficking. This statement covers NCR’s fiscal year ending December 31, 2019.

OUR BUSINESS

Our Company

NCR is a leading software and services-led enterprise provider in the financial, retail, hospitality and telecommunications and technology industries, with business in 180 countries. NCR offers a range of solutions that help businesses of all sizes compete in an ever-evolving landscape of physical and digital consumers by providing software, advisory and consulting services, hardware, support and managed services that run businesses end to end. Our portfolio includes digital first offerings for banking, restaurants and retailers as well as payments, multi-vendor connected device services, automated teller machines (ATMs), point of sale (POS) terminals and self-service technologies. NCR Corporation is the ultimate parent company with global headquarters located in Atlanta, Georgia in the United States. Within the United Kingdom, NCR operates through the subsidiaries NCR Limited, headquartered in London, England and NCR Financial Solutions Group Limited, headquartered in Dundee, Scotland.

Our Supply Chain

We manufacture hardware in facilities in the USA, Brazil, Hungary, and India. These facilities require manufacturing and non-manufacturing suppliers. NCR has a global supply chain, with over 10,000 suppliers providing raw materials, service parts, internally and externally used goods and services, and transportation & logistics.

COMPANY POLICIES AND GOVERNANCE

Policies

NCR supports and respects the protection of internationally proclaimed human rights as proclaimed in the United Nation’s Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact. We are committed to developing, maintaining, and improving systems and processes to avoid complicity in modern slavery both within our operations and throughout our supply chain.

This commitment is embodied in our Code of Conduct and our Human Rights Policy. Our Code of Conduct specifically requires ethical business conduct, including maximum work days and work weeks, minimum wage levels and overtime compensation. Our Human Rights Policy formally documents our position that modern slavery is not tolerated, that we support internationally proclaimed human rights, are committed to developing, implementing and maintaining systems and practices that promote fair labor and environmental sustainability, and to creating a working environment that prevents and detects corruption and appropriately addresses instances of non-compliance.

Training

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. This training reviews, among other topics, NCR's Human Rights Policy. 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 introduced additional training during 2019 to individuals within its organisation, such as supply chain managers, sourcing and compliance personnel who may require more in-depth knowledge about recognising and addressing modern slavery.

Reporting

NCR employees are encouraged to speak up and report any concerns of wrongdoing and of the multiple avenues that NCR provides to report their concerns. Employees can report concerns to their management teams, local human resources or legal departments, and a company-wide Ethics and Compliance Office. We also make available an alert line whereby employees can report concerns anonymously. NCR does not tolerate retaliation against individuals who make good faith reports of misconduct, including reports of potential violations of NCR policies or our commitment to fight modern slavery.

Employment Practices and Procedures

NCR maintains comprehensive employment practices and procedures designed to prevent modern slavery. These practices and procedures include the following:

We adhere to the "Employer Pays" principle - No worker should pay for a job - the costs of recruitment should be borne not by the worker 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 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.

Internal Audit

NCR's Internal Audit procedures include reviews of NCR's compliance with our Human Rights policy, including compliance with this Modern Slavery Act statement.

SUPPLY CHANGE POLICIES AND GOVERNANCE

Policies

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, comply with applicable laws and adhere to our Supplier Code of Conduct. NCR has adopted a Supplier Code of Conduct, which includes, among other things, a requirement to adhere to NCR's Human Rights Policy, which prohibits modern slavery.

NCR requires suppliers to NCR to certify at the time they submit e-sourcing proposals to NCR that that they conduct business ethically and that they either will comply with NCR's Supplier Code of Conduct, or that they maintain 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.

Supply Chain Review

NCR conducts periodic business reviews with our highest spend and/or strategic suppliers.

As part of these reviews, which may be conducted at a supplier's facility, we require suppliers to review our Supplier Code of Conduct, including its human rights provisions, and to confirm they are in full compliance.

Training

NCR implemented training for key sourcing, support and compliance personnel during 2019 to develop improved awareness and understanding of modern slavery risks.

NCR Addresses Concerns

If we identify items of significant non-compliance, 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.

Next Steps

For 2020 NCR's key focus is developing a strategy for identifying high risk suppliers and socialising the strategy within NCR's supply chain organisation.

BOARD APPROVAL

This statement was reviewed and approved by the Board of Directors of NCR Limited on 16th June 2020 and by NCR Financial Solutions Group Limited on 16th June 2020. The Boards of Directors for these entities will review and update this statement on an annual basis.

For more information, visit ncr.com, or email complianceoffice.ethics@ncr.com.

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