

Code of Conduct

NCR Corporation
2022



LETTER FROM MIKE HAYFORD



Team,

For 138 years, NCR has built its reputation on both integrity and innovation. We are committed to conducting business with integrity in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations.

This Code outlines our standards for business conduct, aligning everything we do as a company to our Shared Values and our focus on our customers. We are all accountable to ourselves and to each other to conduct NCR business with the greatest integrity.

Our reputation is one of our most valuable assets. We can never take that for granted, and it must always be the foundation upon which we build and grow.

A handwritten signature in black ink that reads "Mike".

Mike Hayford
Chief Executive Officer

Your way around...

Navigation Bar

You can navigate across the topics at any time, by clicking on any title in the navigation bar.

Both left and right arrow will take you to the previous / next page.



The topic you are currently exploring is bolded.

Icons

These icons are hyperlinked to specific policies and documents, but you must be connected to our corporate network to access them.



Spotlight calls out the important information; you don't want to skip this one!

Clouds

Word clouds will point you to more related content or some important information, throughout this document.

Explore more

This cloud tells you where to find more information about a topic, and is accompanied by one or two of the document icons.

In some cases, we need help with navigating our decision path or we need a direction, and this cloud can give an answer to your question.

What if?

Quick check

This cloud includes fast facts, best examples and checklists, for when you need a quick reference or confirmation.

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AWARENESS

Shared values
What, who & why
Policies
How to report issues

Our shared values

NCR is, was and always will be focused on our customers, our employees, innovation and winning. Our Shared Values are more than just words on a page. They are what direct our behavior, drive how we conduct business and influence how we interact with each other, our customers, our partners, our suppliers and the communities in which we operate. Our Shared Values have allowed us to be successful for over 100 years.

We lead how the world connects, interacts, and transacts with business because we do what we say we'll do and stay accountable. As OneNCR, we consider a wide range of perspectives in bringing bold, new ideas to the real world, ensuring that everything we create benefits everyone we work with. We never stop asking why, never stop improving, and never back down when facing tough challenges - even if that means changing. We have reimagined our core values which we appropriately call **Customer F.I.R.S.T.**



Customer

We treat every customer like they are our only customer - and they are our #1 priority.



Fun

We have fun at work - we are playful, productive, purposeful, and celebrate each other.



Innovation

We learn, we boldly pursue innovation and we solve complex problems with simple solutions.



Respect

We respect each other, include everyone, we lead with empathy, and make our communities better.



Success

We ensure NCR's success by giving our very best and taking ownership from beginning to end.



Teamwork

We work as one team, operate without boundaries, and are global in our mindset.

What?

The NCR Code of Conduct (“Code”) is our guide and point of reference for upholding our Shared Values. It sets the minimum standards for expressing our Shared Values while conducting business. Our internal policies provide additional, detailed information that further develop the expectations outlined in this Code.

Who?

All NCR directors, officers, employees, contractors, agents and any other person representing or acting on behalf of NCR must read, understand and adhere to this Code. Employees who don't follow this Code will be subject to discipline, up to and including termination.

No one may direct you to violate, nor may you direct anyone to violate, this Code, even if doing so appears to be to our advantage. If a provision of this Code conflicts with applicable law, you must report the conflict to our Ethics & Compliance Office and comply with applicable law.

In addition, employees who violate the law may be subject to personal liability.

Any waiver of any provision of this Code requires the approval of our Chief Legal Officer, or the Board of Directors if the waiver is requested by an executive officer or director.

Why?

Ethical behavior and corporate social responsibility can bring significant benefits to our business.

For example:

- Attract customers to our company's products, and in doing so, boost sales and profits.
- Motivate employees to stay with us, reducing turnover and increasing productivity.
- Attract the best talent.
- Attract investors who are increasingly focused on integrity, social responsibility and ethical conduct.

Policy *noun (1)*

pol·i·cy /'päləsē/

plural: policies

1) *a deliberate system of principles to guide decisions and achieve rational outcomes. A policy is a statement of intent and is implemented as a procedure or protocol.*



Corporate Management Policies (CMP) define the way we do business and are organized by function such as: Employment (i.e., relocation), Compensation (i.e., vacations), and Law (i.e., copyright).



Corporate Finance and Accounting Policies (CFAP) support consistent application and control over accounting and financial operations across NCR.



Local, Departmental and Functional Policies, Procedures & Standards apply to certain offices or departments and are often driven by law, regulation or special circumstances.

Policies support our Code of Conduct and provide more details and framework for achieving our company's goals and objectives.

They also:

- State NCR's expectations,
- Foster compliance with laws and regulations,
- Maintain consistency throughout NCR, and
- Provide guidance for decision-making.

All employees must comply with company established corporate policies, including supporting local policies and procedures.

Ethics and compliance

Just as important as what we do, it's what we don't do that tells our story. We never stop asking why, never stop improving, and never back down when facing tough challenges - even if that means changing.

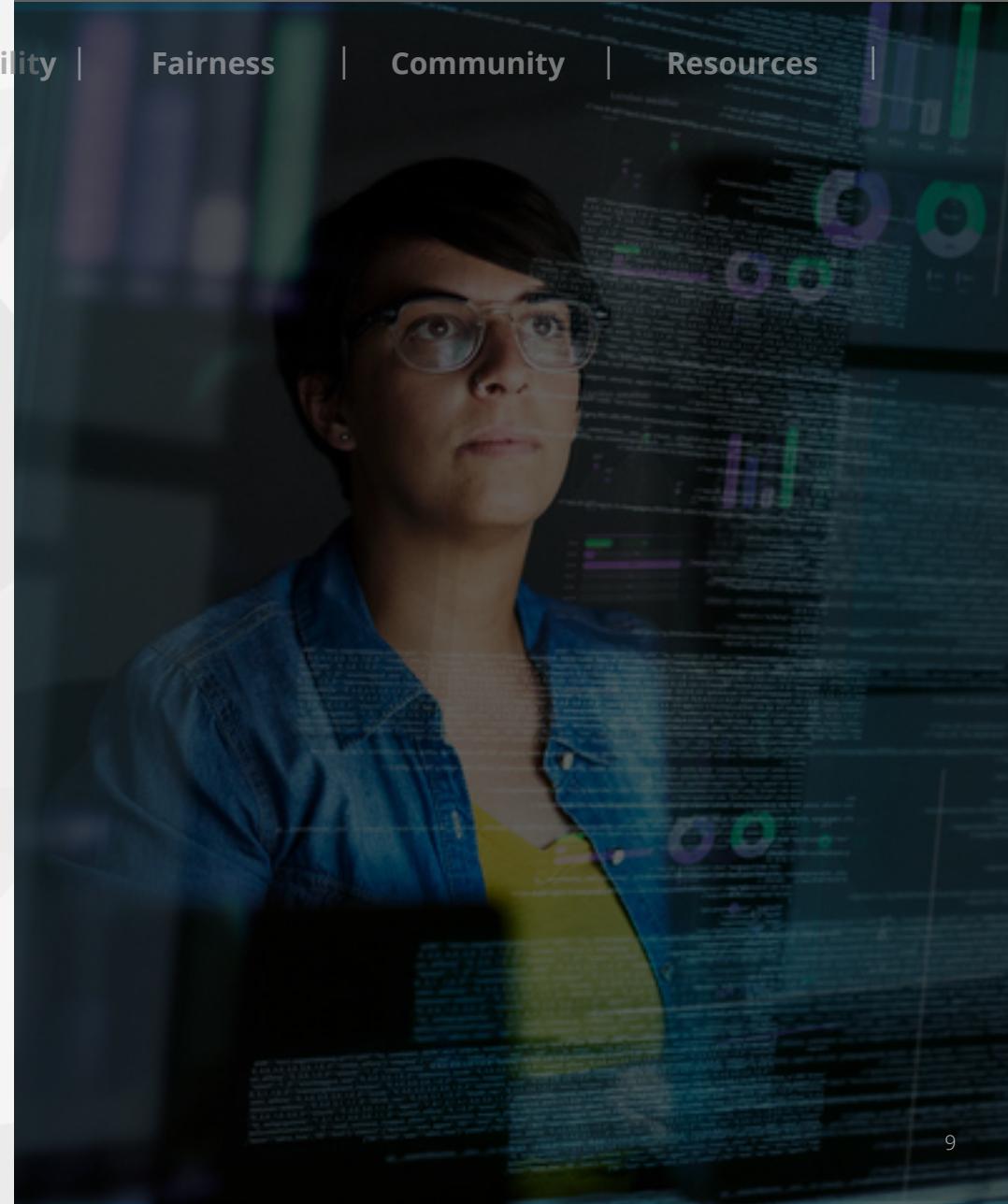
In the end, it's our actions, not our words, that show how we conduct business at NCR. Our Ethics & Compliance department works to help support our company in following these important policies year after year.



Spotlight

The **Ethics & Compliance Team** oversees our compliance with this Code, our Shared Values and internal policies.

The Ethics & Compliance department is independent from the business and every other function of the company and it reports directly to our Chief Legal Officer.





What if?

You've read the policy but you're not sure if it completely applies to your situation, or you're still not certain about what to do? Here are some steps to help get you to the right answer:

1. Since NCR policies are designed to assist in decision making, your first step is to access and read the related policies carefully.
2. If studying the policy doesn't help and you are still unable to apply/interpret it for your situation, discuss the policy with your manager.
3. Still have questions? Contact the [Ethics & Compliance office](#).

How to report issues

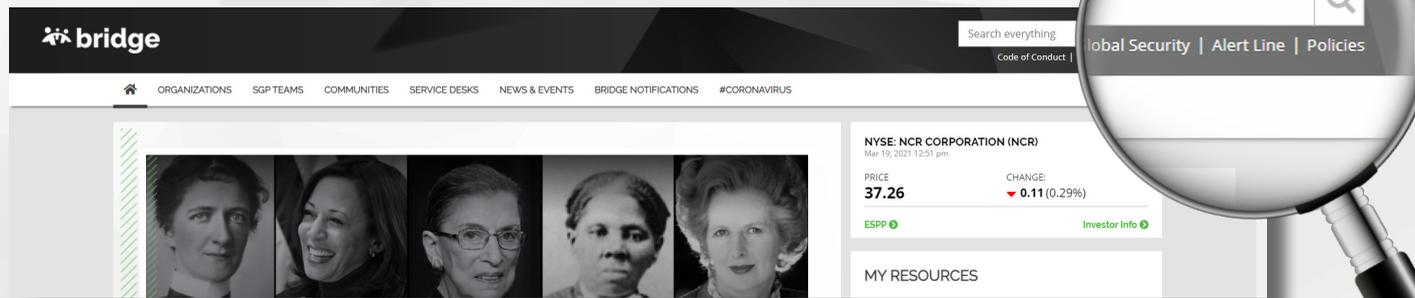
If you are facing a dilemma and are unsure what course of action to take, you should raise your concerns with your manager or the Ethics & Compliance Office. If you suspect or learn of conduct that may violate this Code, you must raise your concerns with the Ethics & Compliance Office right away.

We do not tolerate retaliation against any person for making a good faith report. A good faith report is a report made with honesty and good intention, and whether the report is ultimately proved or not – does not matter.

If you are uncomfortable identifying yourself to the Ethics & Compliance Office, you may ask questions and raise concerns anonymously, where permitted by law. Anyone who attempts to retaliate against an individual for making a good faith report will face disciplinary action, up to and including termination.



You can find links to the Code of Conduct, AlertLine and Policies in the top-right corner of the Bridge.



We expect you to comply with this Code while conducting business. If you know of or suspect Code violations, we expect you to report the conflict to our Ethics & Compliance Office.

**What
if?**

When in doubt, consider the following:

- Is this against company policy or the law?
- What feels wrong about this situation?
- How will I be affected?
- How will our stakeholders be affected?

Investigations

Our Ethics & Compliance Office investigates every report alleging violations of our Shared Values, Code of Conduct and policies. You may not conduct investigations of alleged violations. To ensure that each matter is treated confidentially and consistently, all matters are investigated by the Ethics & Compliance Office.

If you see something – say something!
In any way that makes you feel comfortable:



Talk to your direct manager and try to resolve the issue.



Talk to your local HR business partner. Find who is your HRBP via HR Central.



Send an email to E&C team and raise the issue directly with E&C Office.



Open a case through HR Central about the issue, they're available 24/7.



Submit an Alert Line report through a third-party tool, anonymously.

OWNERSHIP

IT infrastructure
Technical standards
Funds & property
Intellectual property

IT Infrastructure

Our Information Technology (“IT”) infrastructure consists of servers, networks, workstations, laptops, mobile devices, communications equipment, electronic media, and storage devices both operated directly by the company as well as by contracted service providers of the company. It should generally be used only for conducting business, although occasional personal use may be permitted.



Spotlight

How we use our personal devices is our own business, but when we are using them for work, or to connect to NCR’s IT Infrastructure, this Code and our policies apply.

You can’t use personal e-mail accounts (such as Gmail) to conduct business, nor can you send sensitive information or documents to your personal e-mail accounts.

Except where prohibited by applicable law, we reserve all rights to search and review any information sent, received, viewed, accessed or stored using NCR’s IT infrastructure.

Quick check

For questions or concerns about Information Security or unauthorized access to IT infrastructure, contact **Information Security**.

If you receive a suspicious email or phishing attempt, send it as an attachment to **Reports.SPAM@ncr.com**.

If you suspect a device has a virus/malware, contact the Cyber Defense Center directly at **808-7448** from any NCR office, or at **+1 678 808-7448** from any external phone.

For questions or concerns about Data Privacy or protection, contact **Privacy Office**.



Don't use peer-to-peer or torrenting software, install games or anonymous proxy software.

These programs and activities, beyond putting a load on the network, often install malicious code, such as spyware, that can harm NCR's IT infrastructure.

Examples of software that caused malware issues in the past include:

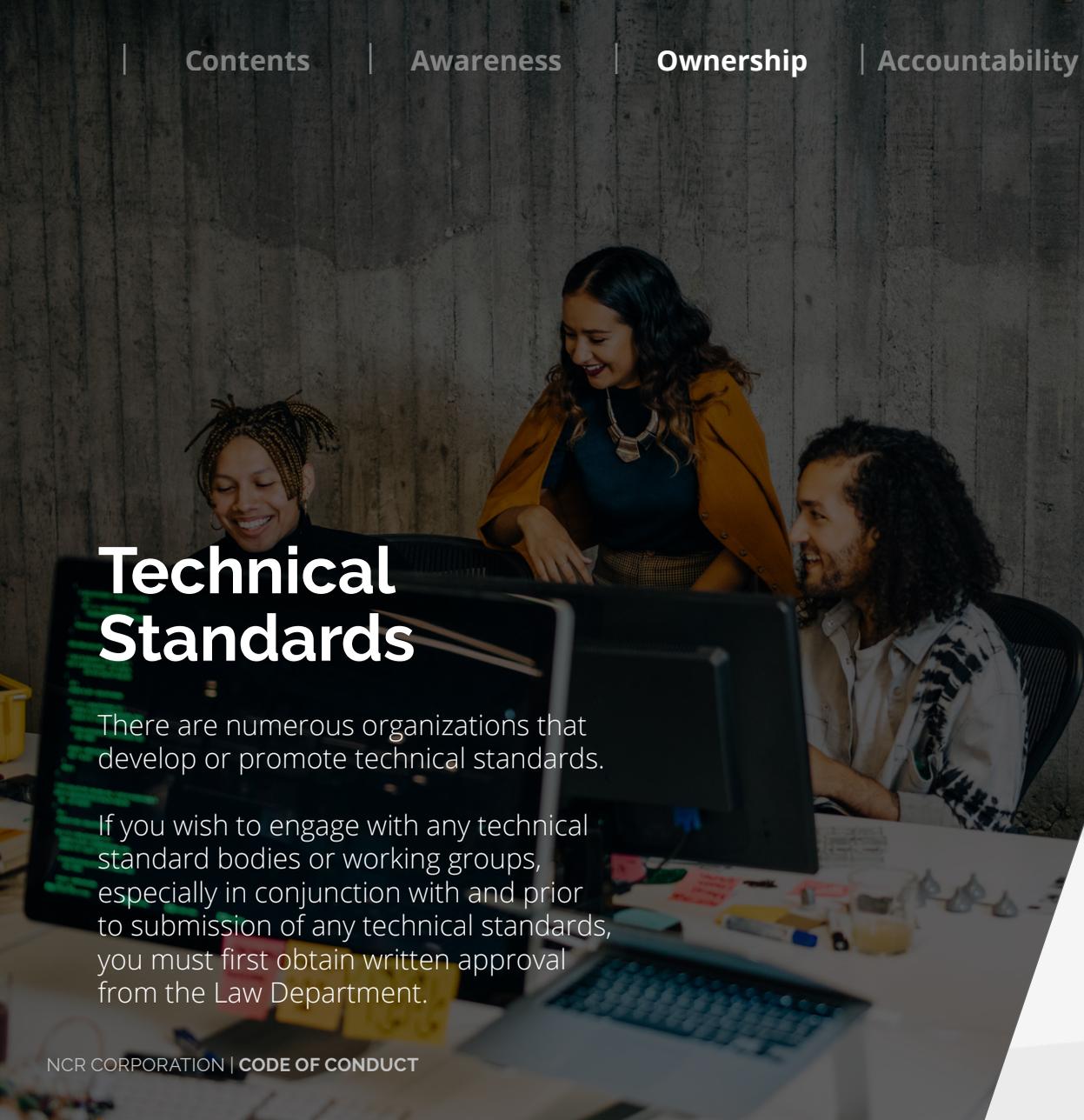
- Tor Browser
- Utorrent
- Bittorrent
- Xunlei - also known as Thunder
- FDM or freedownloadmanager.

You should also generally avoid downloading games and movies – these files often include malware.

CMP #1404 is our
IT Infrastructure
policy.



**Explore
more**



Technical Standards

There are numerous organizations that develop or promote technical standards.

If you wish to engage with any technical standard bodies or working groups, especially in conjunction with and prior to submission of any technical standards, you must first obtain written approval from the Law Department.

Open Source

Open source generally refers to software code that utilizes an open development process and is licensed to include the source code.

NCR may choose to use open-source components for a variety of purposes. This source code is available without a charge and may permit users to use, modify, and distribute any resulting software.

NCR respects the intellectual property rights of others and must strictly comply with the license requirements under which open-source software is distributed.

Before using open-source software components with any NCR product, service, or internal project, you must obtain prior written approvals from the technical teams in the CTO organization and the Law Department.

Company Funds & Property

We all must protect company assets from loss, theft, damage, or unauthorized use or disclosure.

These assets include tangible assets (such as computer equipment and furniture) and intangible assets (such as confidential information and data).

Company assets include but are not limited to:

- trademarks and service marks;
- source code, trade secrets, personal data,
- confidential information, money and charge cards;
- land and buildings;
- records;
- vehicles;
- keys and identity cards, technology equipment including printers, scanners, copiers, and telephones;
- computing devices and software;
- Internet, intranet, and other networks;
- scrap and obsolete equipment.



Copyrights & Intellectual Property

Intellectual property (IP) laws protect intellectual property from unauthorized use, duplication, distribution, display, and performance. Infringing on intellectual property rights can result in legal penalties and, in some cases, damage to our own IP rights. We all must protect the company's IP rights and respect the IP rights of third parties. NCR trademark is registered in over 70 countries.

A trademark typically protects brand names and logos used on goods and services.
A copyright protects an original written, artistic or literary work.
A patent protects an invention.



NCR Aloha™



NCR SelfServ™



ACCOUNTABILITY

Conflicts of interest
Company records
Confidential information
Compliance

Conflicts of interest

You must always act at an arm's length basis and in the best interests of the company when conducting business with outside parties on our behalf. Conflicts of interest arise when personal interests influence, or appear to influence, our ability to do so. Conflicts of interest can arise for many reasons, including personal activities, interests, and relationships. You may not conduct any business if you have, or even appear to have, a conflict of interest that could affect your ability to act in our best interests.

If you have a conflict of interest, or if a situation arises that makes it appear you may have a conflict of interest, you must disclose the situation to your manager. Your manager will discuss the matter with the Ethics & Compliance Office so that the conflict can be assessed, and appropriate measures can be taken. Disclosure of all actual or potential conflict situations is mandatory.



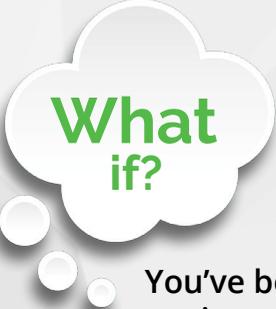
**Spot
light**

Remember, it's not possible to list every potential conflict of interest scenario. If you're not sure if a situation represents a conflict, ask your manager, HRBP, or Ethics and Compliance office.

**Explore
more**

CMP#901 provides detailed information about conflicts of interest.





What if?

You've been approached to sit on the board of directors of another company.

You should inform your manager to review the situation and receive guidance on whether you can accept the position. Next, report the position to Ethics & Compliance. We need to fully understand the position before we can confirm it will not create a conflict of interest with your position at NCR.



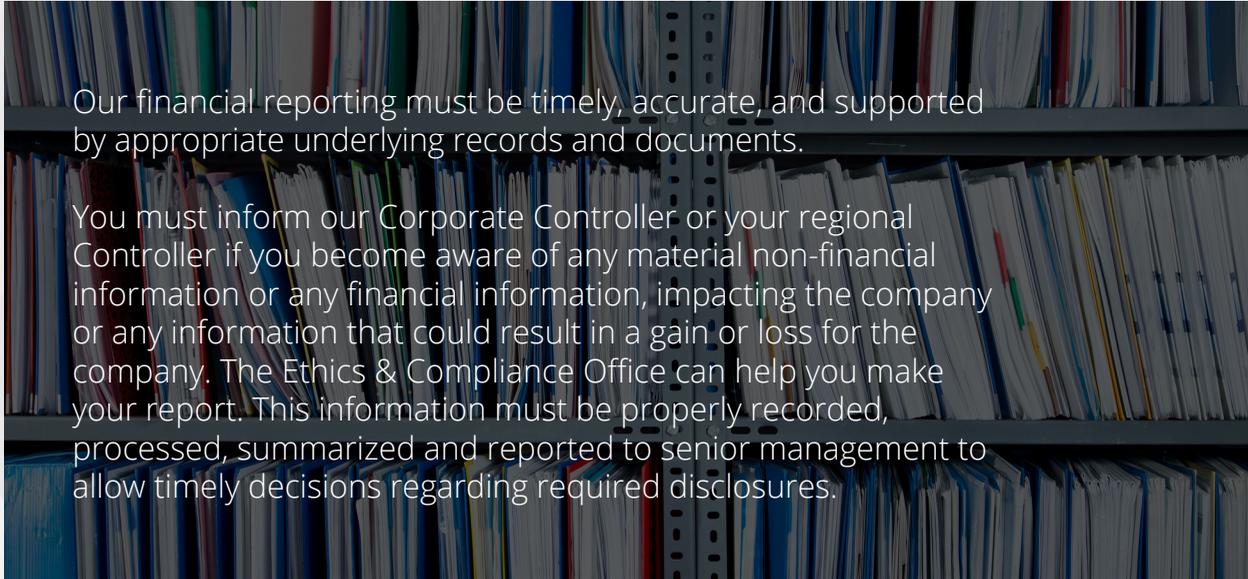
Quick check

A conflict of interest can happen when:

- **You take** on additional employment that pulls your attention away from your NCR responsibilities. It may be impossible to fully and faithfully perform both jobs.
- **You supervise** or do business with someone with whom you have a close personal relationship, or if **you and a family member** are employed by the same NCR organization. This can cause an actual or apparent conflict of interest as people can assume favoritism whether or not it exists.
- **You invest** in one of our suppliers, customers, business partners, or competitors.
- **You use the NCR name** or our property or information, without approval, to support a charitable, professional or community organization.
- **You take** for yourself a business opportunity that belongs to NCR.

Accuracy & Retention of Company Records

We are required to maintain complete and accurate business records to meet financial, legal, and management obligations. We use this information to fulfill our obligations to customers, suppliers, shareholders, employees, and government agencies. Everyone must follow our internal controls and procedures to ensure that all transactions are properly authorized, that our assets are safeguarded against unauthorized or improper use, and that all transactions are properly recorded and reported in accordance with our internal policies and applicable law.



Our financial reporting must be timely, accurate, and supported by appropriate underlying records and documents.

You must inform our Corporate Controller or your regional Controller if you become aware of any material non-financial information or any financial information, impacting the company or any information that could result in a gain or loss for the company. The Ethics & Compliance Office can help you make your report. This information must be properly recorded, processed, summarized and reported to senior management to allow timely decisions regarding required disclosures.

Proper record retention is important to ensure records are systematically maintained and available to satisfy corporate, governmental and other requirements.

CFAP #111 is our Records Retention policy.



**Explore
more**

Confidential Information

Confidential information includes all non-public information and any information that, if disclosed, would otherwise be harmful to its owner or its customers. Confidential information, including our own confidential information and confidential information entrusted to us, may not be disclosed even within the company, except as required by law or as permitted by our policies.

If you have a legitimate business purpose to disclose any confidential information, consult with the Law department to put appropriate protections in place prior to disclosure.

CMP#926 provides additional detail regarding Confidential Information.



**Explore
more**



Maintaining confidentiality within NCR is important.

At times, you may have confidential information that may not be shared within the company, such as personnel data and strategic plans.

Quick check

Some examples of confidential information are:

- Trade secrets and know-how
- Research and development, including inventions, patent applications, and engineering and laboratory notebooks
- Customer, stockholder, and supplier lists and information
- Network management information
- Confidential manufacturing processes or procedures
- Source code
- Business strategies and results, product plans, information about unannounced products or services, concepts and designs, marketing plans, pricing, and financial data
- Confidential organizational information, including organizational charts
- Confidential information NCR obtains from third parties.
- Information concerning potential acquisitions or divestitures
- Company financial outlooks and projections

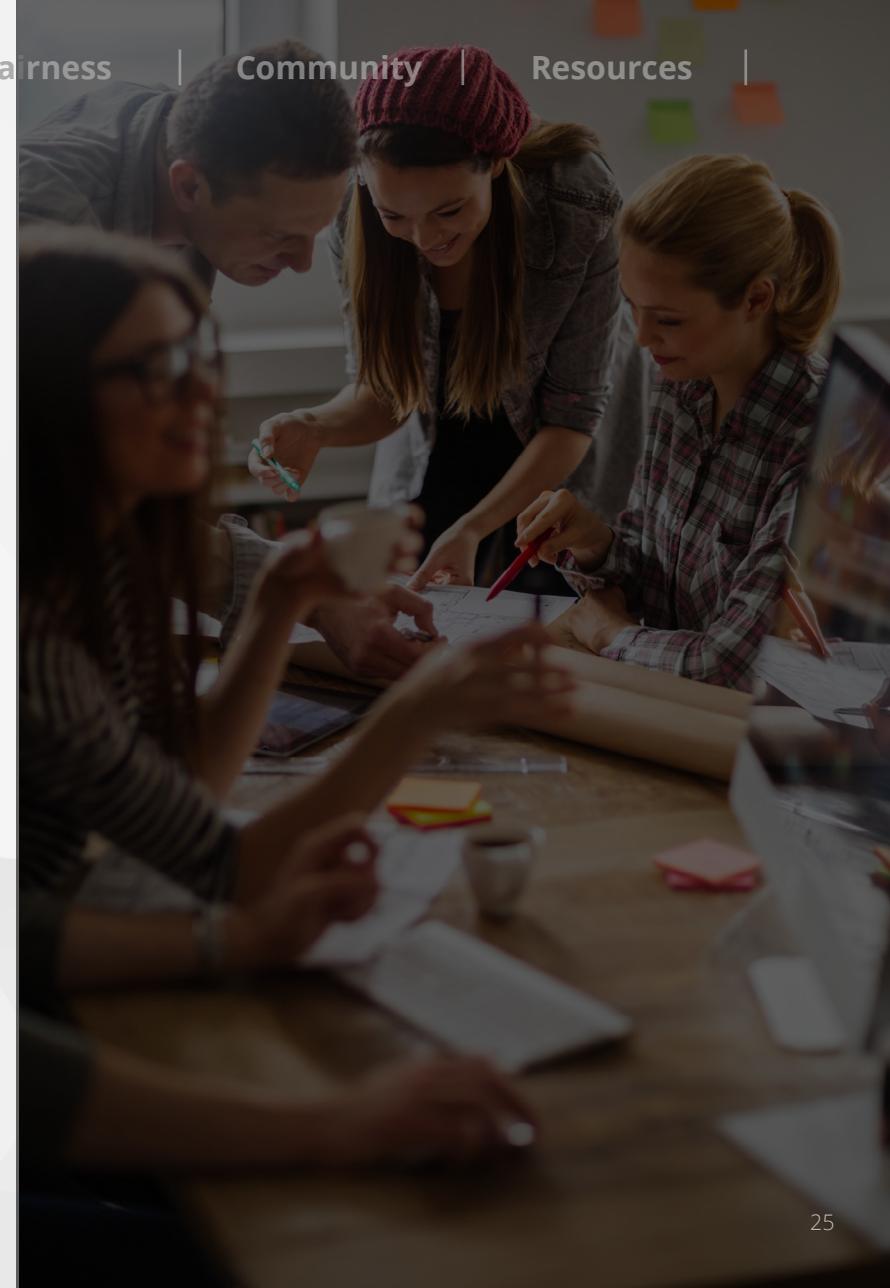
Compliance with Laws, this Code, and Policies

You must comply with this Code, our Shared Values, all our internal policies and all applicable laws and regulations when conducting NCR business. You may not direct anyone to or assist anyone with violating this Code, our Shared Values, all our internal policies and/or all applicable laws and regulations when conducting NCR business.

Ignorance of this Code or the requirements of a particular policy will not excuse a violation.



Your manager cannot instruct you to violate NCR policy. If you are concerned that an NCR policy conflicts with legal requirements, escalate your concerns to the Ethics & Compliance Office.



FAIRNESS

**Anti-bribery & Anti-corruption
Competition
Investment Rules and "Insider Trading"
Trade compliance**

Anti-Bribery and Anti-Corruption



As a global company, we are subject to many anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. These laws prohibit providing, promising or receiving anything of value, directly or indirectly, to or from a third party to influence their judgment or conduct.

Violating anti-bribery and anti-corruption laws can lead to large fines and penalties and can cause serious harm to our reputation. In addition to damaging our reputation, violating anti-corruption laws can subject both you and the company to severe civil and criminal penalties.



Don't bribe anyone,
anytime, for any reason.

You may not promise or provide bribes to or receive bribes from any person. You must report any attempt to give or receive a bribe to our Ethics & Compliance Office right away. Facilitation payments, payments to secure or expedited performance of routine, lawful actions, are also prohibited.

CMP#904 sets our expectations for business conduct.



Explore more

Case #1 – LM Ericsson

In 2019, Ericsson, an international telecom company, agreed to pay more than \$1 billion to the SEC and DOJ to resolve charges that it violated US anti-corruption laws by engaging in a large-scale bribery scheme.

Case #2 – Goldman Sachs Group, Inc.

Connected to the “1Malaysia Development Berhad” (1MDB) bribe scheme, Goldman Sachs Group, Inc. agreed to pay more than \$1 billion to settle SEC charges that it violated provisions of the FCPA, in 2018.

Case #3 – Novartis AG

In 2020, to resolve SEC and DOJ charges arising out of bribery conduct in multiple jurisdictions, Swiss company Novartis AG and a former subsidiary agreed to pay over \$340 million in criminal and regulatory penalties .

Competition

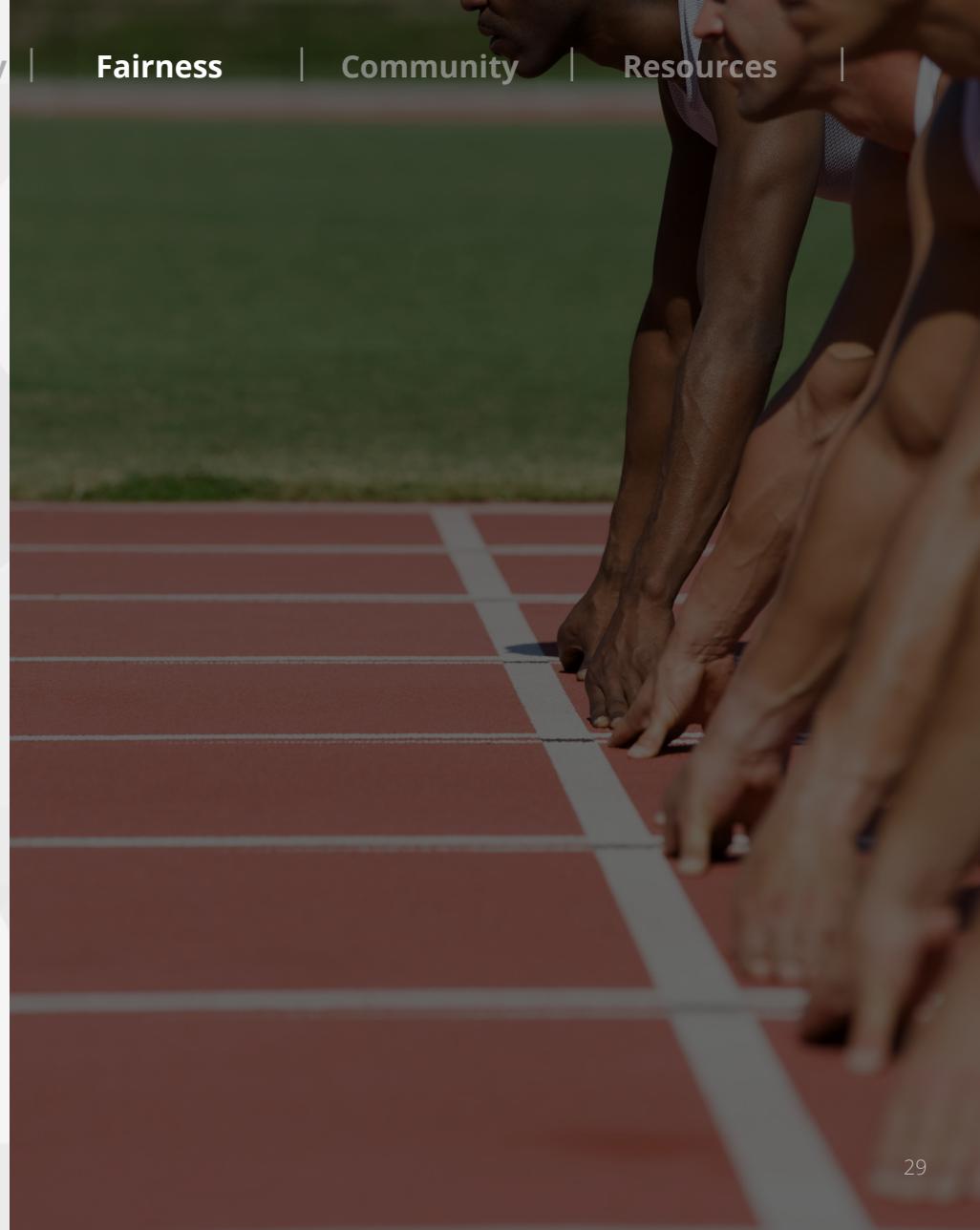
We deal fairly with our customers, suppliers, strategic partners, employees, and competitors. We compete vigorously, but always fairly and ethically. Our successes come from the strength of our people, products, and services – not from unfair business practices. You may not use deception or misrepresentation in your dealings on behalf of the company nor abuse confidential information. Additionally, special care must be taken when dealing with government customers.

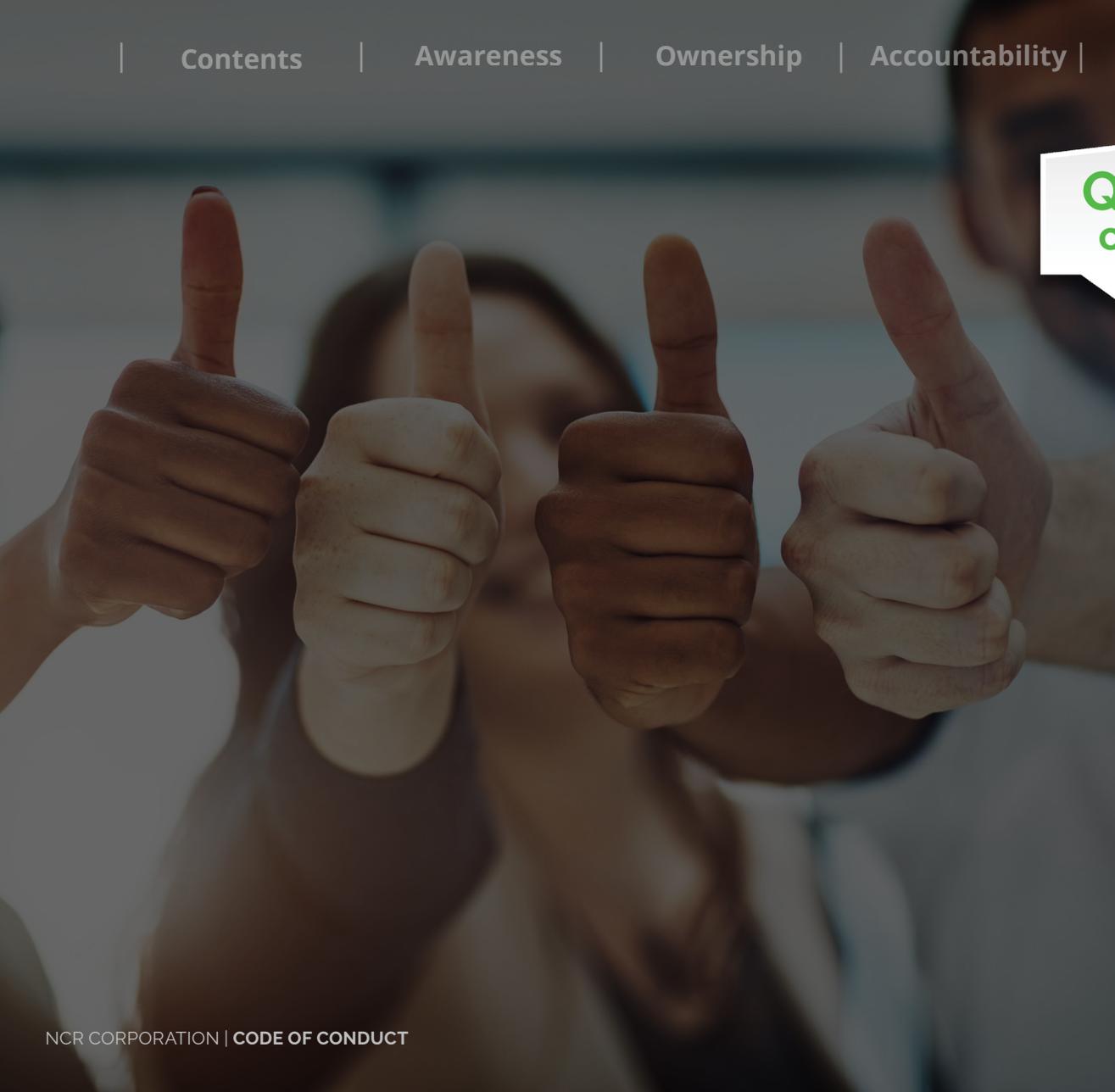
We choose suppliers based on merit, considering factors such as price, quality, delivery capability, technology, design, and reputation for service and integrity.



Spotlight

Activities that might be appropriate when working with private-sector customers may be considered improper and even illegal when dealing with government employees.





Quick check

- **NO Reciprocal Agreements** – if one party will buy from a second party, on the condition that the second party will buy from the first party.
- **NO Market Allocation** – agreements to ‘divide up’ or allocate markets with third parties.
- **NO Bid Rotation** – cooperating with a competitor to allow them to win an opportunity in exchange for their cooperation for our winning another opportunity.
- **NO Price Fixing** – agreeing with third parties to set prices at a certain level or to maintain certain market conditions.
- **NO Refusals to Deal** – agreeing with third parties to refuse to deal with any specific customer, supplier, or group of customers or suppliers, in violation of law.
- **NO Abuse of Size** – using market power to improperly disadvantage smaller competitors.
- **NO Abuse of Data** – using data analytics for improper or illegal purposes.

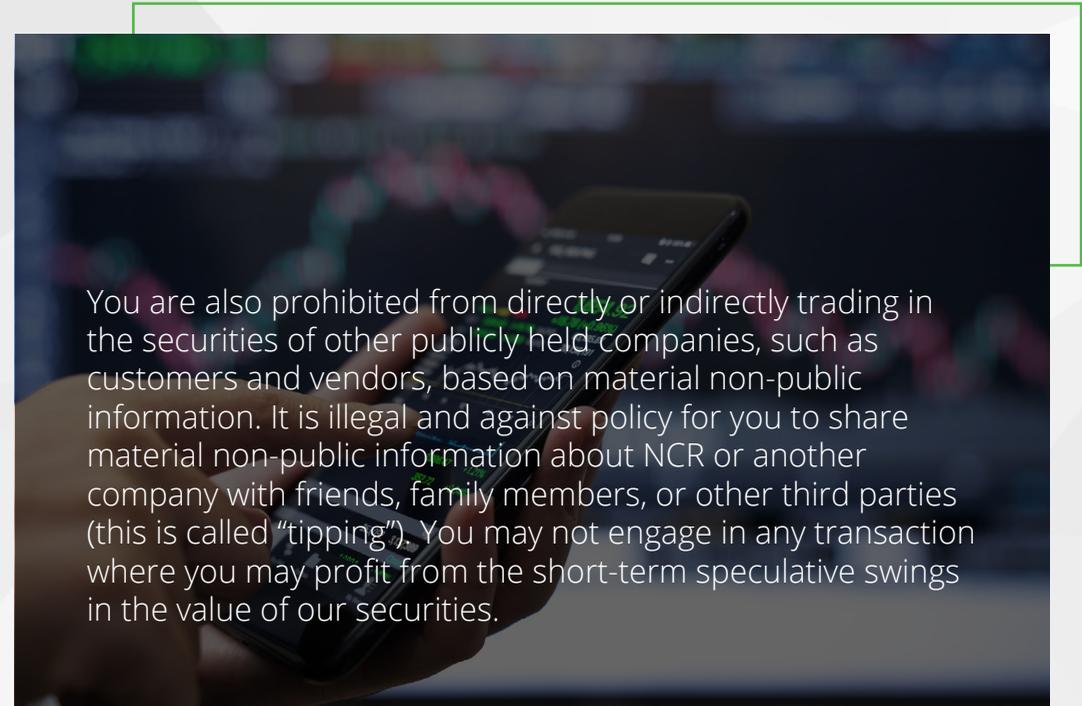
Investment Rules and “Insider Trading”

You may not, directly or indirectly, trade in our securities while in possession of “material non-public information” about the company.



Material non-public information is generally defined as any information that has not been widely disclosed to the public and is likely to influence an investor to buy, sell, or hold a company's stock.

It could be acquisition or divestiture plans; actual or projected financial information not yet public; new contracts, products, or discoveries; major organizational changes; or other business plans.



You are also prohibited from directly or indirectly trading in the securities of other publicly held companies, such as customers and vendors, based on material non-public information. It is illegal and against policy for you to share material non-public information about NCR or another company with friends, family members, or other third parties (this is called “tipping”). You may not engage in any transaction where you may profit from the short-term speculative swings in the value of our securities.

Quick check

- Never provide material non-public information about NCR or other companies known to you through your work at NCR
- Restrict access to material non-public information about NCR or other companies to those employees who “need-to-know” that information for business reasons (such persons may be identified in a non-disclosure agreement)
- Do not advise or encourage another person to trade in a company’s stock if you have material non-public information about that company
- Never buy or sell NCR securities or another company’s publicly traded stock while in possession of material information, whether or not a blackout period is pending

Explore more

CMP#922 is our Insider Trading Policy.



Trade Compliance

As a global company, we must be aware of international trade laws that regulate the imports and exports of our products and services. Import laws typically govern what can be imported into a country, how the articles must be marked, how the imported merchandise must be valued, and what duties must be paid.

Export laws typically govern whether export of a good or service is permitted and how it may be exported. Trade laws govern all aspects of trade, including access restrictions, sourcing requirements, economic sanctions and embargos, and antiboycott requirements.

You may only import or export products and services using processes approved by the Trade Compliance Department.

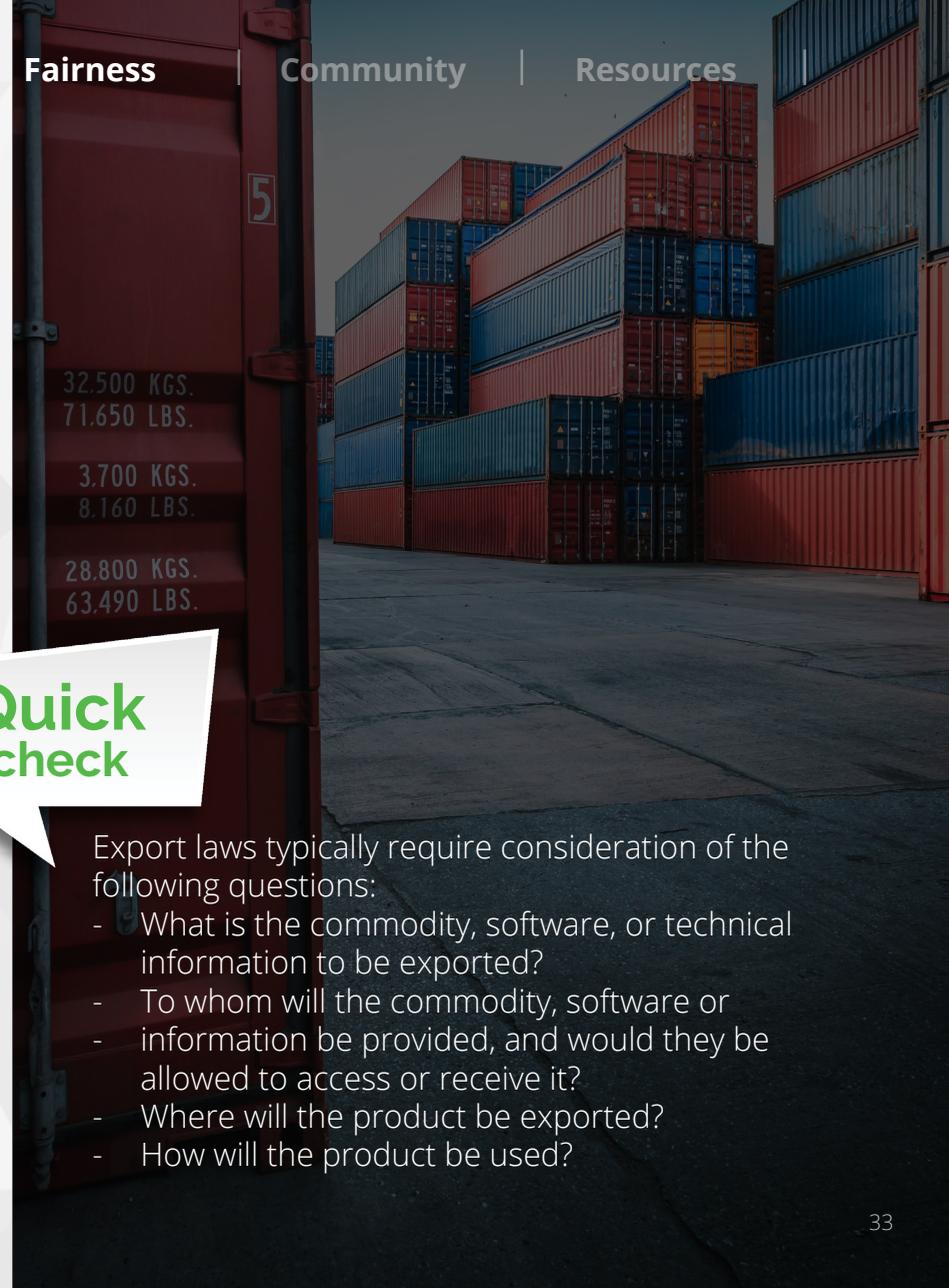


If there appears to be a conflict between laws, customs or local practice, get help from the Trade Compliance Department – Brokers.ImportNCR@ncr.com

Quick check

Export laws typically require consideration of the following questions:

- What is the commodity, software, or technical information to be exported?
- To whom will the commodity, software or information be provided, and would they be allowed to access or receive it?
- Where will the product be exported?
- How will the product be used?





What if?

You're getting ready for your business trip, and a colleague asks you to bring an item for testing to our office in another country. What should you do?

While it is simple to pack an item in your bag and travel to another country, there are specific requirements to do this legally. Hand-carrying commercial goods, professional equipment, or other NCR related goods while traveling is subject to export/import laws of the U.S. as well as other countries.

While the U.S. and other country's laws may permit hand-carry of personal items (i.e. laptops, cell phones, digital storage devices, and commercial encryption products), transporting commercial goods in your personal luggage requires pre-approval. For approval and advice on how to do this legally, contact Trade Compliance in the Law Department.

COMMUNITY

Non-discrimination & equity
Safe work environment
Gifts & contributions
Human rights
Social media

Non-Discrimination, Harassment & Equal Employment Opportunity

We do 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, veteran status, or any other basis protected by law.

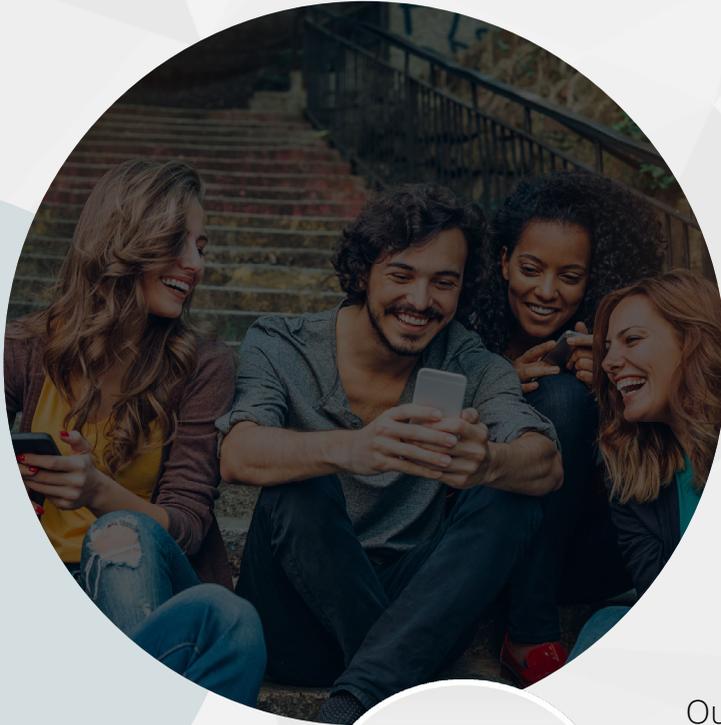
All employment-related decisions must be based upon legitimate job-related factors, including qualifications, experience, skills, and performance.

Quick check

NCR does not tolerate discrimination or harassment. This applies to everyone - not only our people but also our suppliers, our customers and our partners.



Respect is the foundation of ethical behavior, and mutual respect reinforces good relationships. Mutual respect is accepting differences in a respectful manner in situations when two people may not agree. Allowing one another the right to be heard and have the same opportunities as everyone else no matter their differences. Having mutual respect involves recognizing differences, understanding their significance, and responding with awareness, politeness, and care. A lack of mutual respect could lead to unethical behavior such as bullying or harassment. All employees should work to create an environment where everyone feels welcomed, fairly treated, and fully supported to do their best.



“Our company’s character has been forged over our 136-year history thanks to the global nature of our business, which has strong representation from many nationalities, cultures and walks of life.

We will continue to build on this heritage while strongly advocating to promote a more equitable and diverse society and continue to stand with everyone peacefully protesting against hate, injustice and oppression everywhere.”

Mike Hayford, September 2020



We do not tolerate conduct that creates an intimidating or offensive work environment. We prohibit all types of harassment and bullying, including physical, verbal and visual.

Explore more

Our CMP #701 addresses non-discrimination and equal employment opportunity.



CMP#702 is our Harassment Policy.

Safe work environment

At NCR, we have a zero-tolerance policy for acts or threats of violence. Everyone must report any suspicious activity, including threats and actual acts of violence occurring while conducting business, both on and off our premises. We prohibit the possession of weapons in the workplace.

We prohibit the unlawful use, possession, distribution, or sale of controlled substances on our premises, in our vehicles, and while conducting business or representing the company.

You may not use or be under the influence of alcohol or marijuana, even where use is lawful, while conducting business. If alcohol is permitted during social events, you are expected to exercise good judgment and moderation.

Everyone must comply with the health and safety practices established by law, Human Resources, and Global Security and must report accidents, injuries and known or suspected unsafe conditions, procedures, or behaviors.

Quick check

Remember, social events, such as company holiday parties, client events, and office happy hours, are work events where this Code applies.

CMP#219 is our Drug-free Workplace Policy.



Explore more

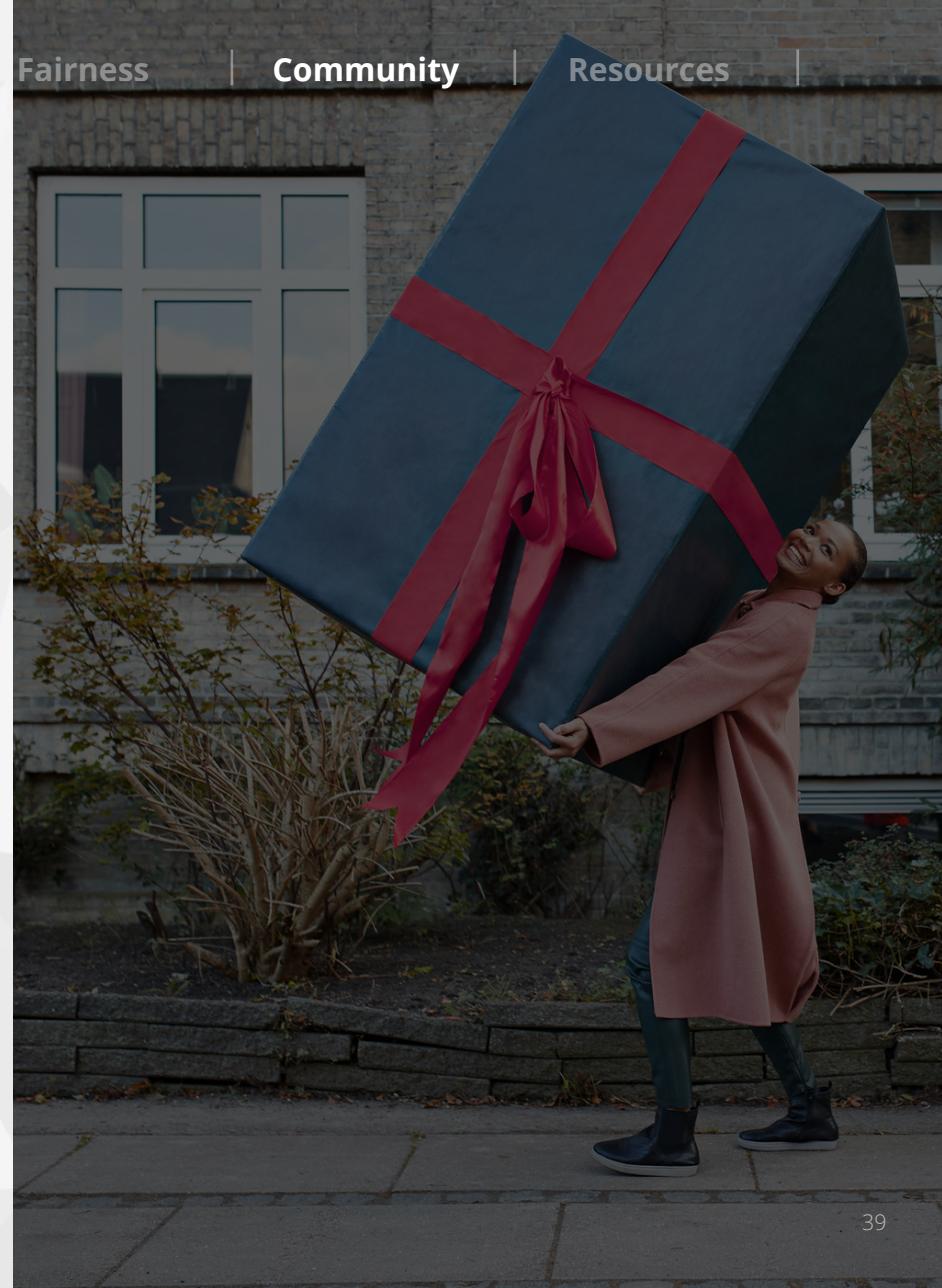
Gifts and contributions

Occasional gifts that do not risk creating an actual or apparent conflict of interest or violate anti-bribery or anti-corruption laws are permitted. Generally, you may only receive and give gifts that are infrequent, modest in value, consistent with local business practices, and reported accurately in our books and records.

You may not solicit gifts, give or receive gifts in exchange for anything in return, or give or receive extravagant or lavish gifts. All gifts must be permitted by our Conflict-of-Interest Policy, Standards for Business Conduct Policy, and Gifts & Entertainment Policy.



These policies and rules apply to “anything of value”, a term that is much broader than what we typically think of as gifts. It can include loans, donations to favored charities, access to confidential information.



Giving gifts to and receiving gifts from governmental officers and employees is subject to additional rules. You must receive prior written approval from the Law department and Government Relations department before making or accepting any such gift and prior to contributing or donation to any political parties, activities, or initiatives using company funds or other property.

Quick check

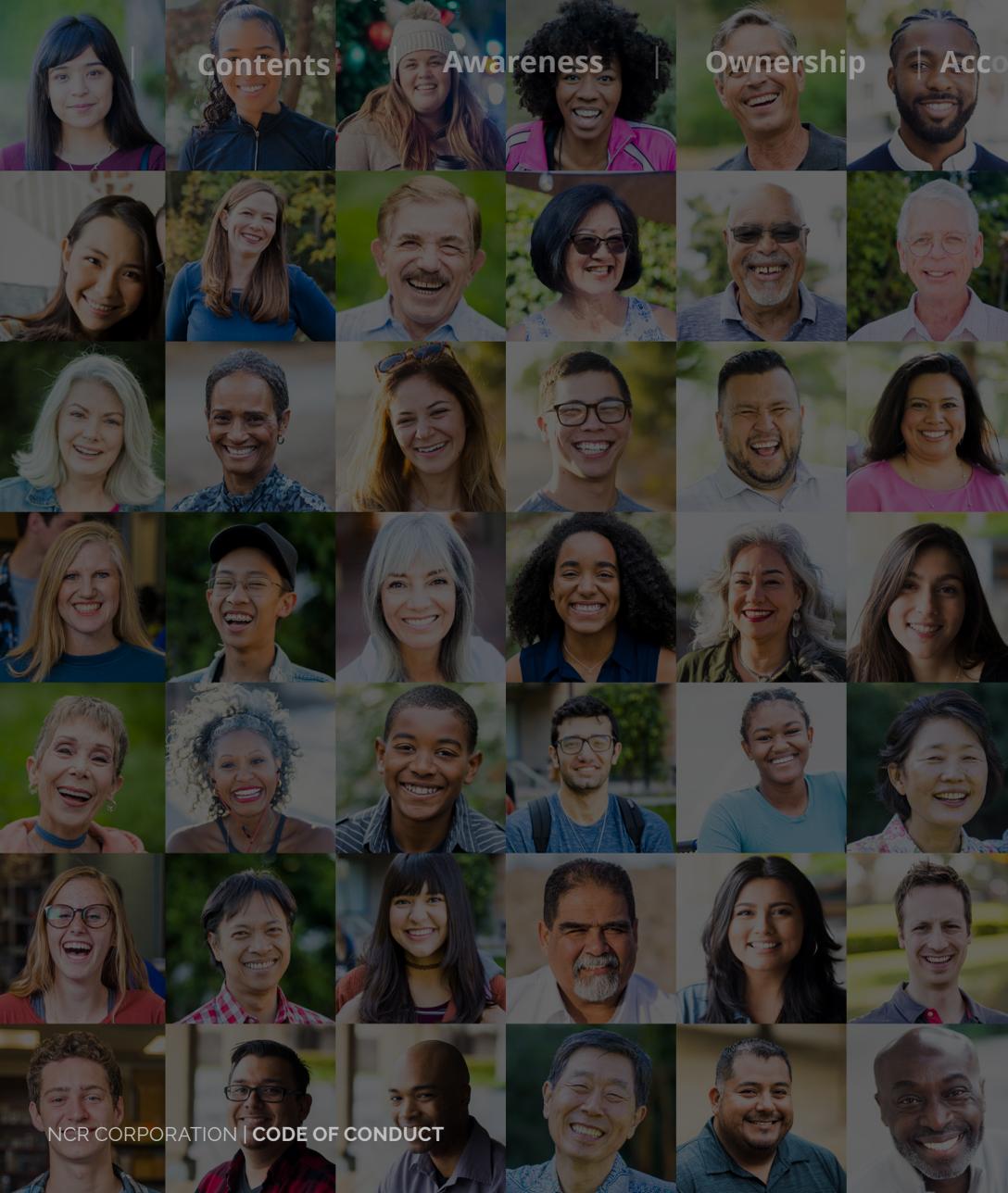
All gifts and donations to charitable organizations require prior written approval from the NCR Foundation. You can reach out to NCR Foundation via email or download the Charitable Sponsorship Approval form from here.



Explore more

Our CMP #912 speaks about how to handle Gifts and Entertainment related situations in the workplace.





Human rights

We strictly prohibit human trafficking and forced labor of any type, including but not limited to sex trafficking, debt bondage, forced prison labor, and child labor.

We do not permit:

- the hiring of individuals below the legal working age,
- the performance of dangerous work by workers under 18 years of age,
- corporal punishment and the threat of corporal punishment,
- requirements for worker deposits, retaining employee identity or immigration documentation and any other action that could restrict employees from freely terminating their employment.

CMP#927 is our Human Rights policy.



Explore more



We are striving to:

- provide fair compensation to all employees, officers and directors that meet, or exceed, minimum standards set by applicable law, including the payment of overtime wages;
- cap daily and weekly working hours at or below limits set by applicable law, ensuring that all overtime is reasonable, and achieving work-life balance;
- respect employees' rights to freedom of association and collective bargaining to the full extent provided by law;
- use internal and external recruiters with sufficient training to support compliance with this Code.

Social Media

Special care should be taken when using social media, professionally or personally, when your account is associated with NCR. While NCR employees are free to express their thoughts and opinions, remember that your activity can impact NCR and its reputation. Social media activity that violates your confidentiality obligations or negatively impacts NCR's reputation may result in disciplinary action.

Please post! We encourage employees to post on social media. Spread the word about NCR and participate in the #NCRLife hashtag.

Click on green logos on the right to see the latest posts on our official channels!



Use good judgement: Nothing is truly private, no matter what your privacy settings are, so simply don't post something that you wouldn't want your employer to see, including anything about NCR that is confidential.

Quick check

Disclose affiliation:

If employees talk about NCR on social media, they **MUST** disclose their relationship with NCR on their profile or in the post – this is required by law.



RESOURCES

This Code is our guide and point of reference for upholding our Shared Values. It sets forth minimum standards for how we express our Shared Values while conducting business. It is not an employment contract. It does not cover every requirement of our internal policies, legal and regulatory obligations or local rules or procedures.

If you have any questions about your ethical obligations, you should raise them with the Ethics & Compliance Office.

You can contact the NCR Ethics & Compliance Office in three ways. All methods are available on a 24x7 basis:

1. Make a web-based Alert Line report. Click on the Alert Line link on Bridge homepage or scan the QR code on the right, to access the site of our third-party Alert Line provider, Navex Global, Inc. The site will instruct you on how to make a web-based report and will also allow you to submit attachments with your report.
2. Call the Alert Line. You may contact NCR's third-party Alert Line provider over the phone. The Alert Line supports many languages.

In the U.S.: Call toll-free 1-888-256-5678

- All other countries: Call the applicable AT&T USA Direct number for your country. Once you have accessed AT&T Direct, dial 1-888-256-5678.
3. Send an e-mail directly to the Ethics & Compliance mailbox at CE230007@ncr.com. This method is often appropriate for questions about how to apply an NCR policy.

Quick check

You can reach E&C by e-mail at ComplianceOffice.Ethics@NCR.com or by using the Alert Line –

