



## **NCR Atleos Whistleblower Policy effective August 29, 2024.**

### **POLICY PERSPECTIVE**

This Reporting and Non-Retaliation Policy (this “Policy”) governs how NCR Atleos directors, officers, employees, contractors, agents, and any other person representing or acting on behalf of NCR Atleos and/or an affiliate of NCR Atleos (each, an “NCR Atleos Associate”) report conduct that they know, or reasonably understand or suspect might violate NCR Atleos’ Code of Conduct, Shared Values, policies, or applicable law (“Reportable Conduct”). It also sets forth the protections available to NCR Atleos Associates and other reporters who report Reportable Conduct.

It is the obligation of all NCR Atleos Associates to report Reportable Conduct. This enables NCR Atleos to investigate possible misconduct and take appropriate action. NCR Atleos will not tolerate retaliation against anyone who reports Reportable Conduct in good faith.

### **POLICY**

All NCR Atleos Associates have an obligation to report Reportable Conduct. Failure to report Reportable Conduct may result in disciplinary action. NCR Atleos will not tolerate and will not allow any NCR Atleos Associate to retaliate against any person for making a good faith report of Reportable Conduct.

### **POLICY STATEMENTS**

#### **1. Scope of Policy**

- 1.1. The reporting and cooperation obligations set forth in this Policy apply to all NCR Atleos Associates, unless mandatory reporting or cooperation requirements are prohibited by applicable law.
- 1.2. The reporting obligations set forth in this Policy apply to conduct that an NCR Atleos Associate reasonably understands or suspects to be Reportable Conduct. If an NCR Atleos Associate does not have enough information to suspect Reportable Conduct has or is occurring, there is nothing more to do. There is no obligation to investigate or confirm the suspicion.
- 1.3. The reporter protections apply to everyone. NCR Atleos affords the protections set forth in this Policy to all reporters, witnesses, and anyone else who fully cooperates with investigations of Reportable Conduct, whether or not they are NCR Atleos Associates.
- 1.4. This Policy only applies to Reportable Conduct. It does not apply to employee grievances or disagreement with policy decisions or interpretations unless they rise to the level of Reportable Conduct.

#### **2. Reporting**

- 2.1. NCR Atleos Associates are obligated to report Reportable Conduct.
- 2.2. Ex employees, candidates for employment in NCR Atleos, a person with ownership stake in NCR Atleos, candidates for contractual relationship with NCR Atleos as a contractor, subcontractor, supplier, interns and volunteers in NCR Atleos, persons wishing to establish a contractual relationship as an individual entrepreneur, stake owners or managers or intern and volunteer; entrepreneurs, stake owners, managers, interns or volunteers whose contract has been terminated with NCR Atleos may also submit reports of Reportable Conduct (each, the “Other Reporter”). Both NCR Atleos Associate and the Other Reporter are jointly referred to in this Policy as the “Reporter”.
- 2.3. Above stated persons are required to report Reportable Conduct to NCR Atleos’ Ethics & Compliance Office. If the Reportable Conduct involves a member of NCR Atleos’ Ethics & Compliance Office, the Reporter should submit their report to the NCR Atleos Human Resources Department (Communications.HR@ncratelos.com). All references to the NCR Atleos’ Ethics & Compliance Office will apply to NCR Atleos Human Resources Department accordingly.
- 2.4. Reports to the NCR Atleos Ethics & Compliance Office can be made by e-mail at [ComplianceOffice.Ethics@ncratelos.com](mailto:ComplianceOffice.Ethics@ncratelos.com) (or [Communications.HR@ncratelos.com](mailto:Communications.HR@ncratelos.com) accordingly). Reports may also be made anonymously using the [Alertline](#). Upon motion, report may be submitted in person, during a meeting organized within 14 days of receipt of such motion.
- 2.5. Reporters should provide as much information as possible. Information such as dates, times, location, individuals involved, witnesses, evidence and any other information about the Reportable Conduct may assist the investigation.
- 2.6. The NCR Atleos Ethics & Compliance will confirm receipt of report within 7 days of its submission, provided that the Reporter indicated contact address for this purpose.
- 2.7. All Reporters are entitled to file an external report to the Ombudsman or public authority. Upon request the NCR Atleos Ethics & Compliance Office will provide further information on filing an external report.

### **3. Investigations**

- 3.1. The NCR Atleos Ethics & Compliance Office will commence an investigation of each report of Reportable Conduct (each, an “Investigation”) as soon as possible, but no later than 30 (thirty) days from the date of confirmation of receipt of the report or its anonymous submission. This deadline can be extended in particularly justified cases, with notification sent to the Reporter. In this case, the Reporter must be informed briefly by e-mail about the expected date of the investigation and the reasons for the extension of the investigation. The deadline for investigating the Report and informing the Reporter of its outcomes may not exceed 3 (three) months, even in the case of an extension.
- 3.2. In case that the Report has been submitted anonymously and it was not possible to get in contact with the Reporter, information in the Section 3.1 above, will be uploaded in the Alertline.
- 3.3. The Ethics and Compliance Office has oversight of the investigation process, ensuring it aligns with company policies and legal requirements. Cases may be referred to NCR Atleos’ Human Resources Department, Internal Audit Department, Global Security, or other appropriate departments or a combination thereof for investigation.
- 3.4. The Investigators may need additional information, in which case the Reporter will be

invited to complete and clarify the facts and the Report. Reporters using the Alertline should check the status of their reports to ensure the Investigators have not asked any unanswered follow-up questions.

- 3.5. All NCR Atleos Associates are required to cooperate fully with any Investigation. Refusal to cooperate, deception or interference with an Investigation may result in disciplinary action, including termination. Investigations are confidential and may not be discussed with any person, whether or not involved in the Investigation. Any questions about confidentiality should be directed to NCR Atleos' Ethics & Compliance Office.
- 3.6. NCR Atleos Associates are strictly forbidden from conducting investigations of known or suspected Reportable Conduct.
- 3.7. All Investigations will be conducted in a manner that is fair, confidential, conducted without bias and in a timely manner.
- 3.8. Investigation of the Report may be dismissed if: a) the Report has been made by an unidentifiable Reporter (the Reporter cannot be identified and if, despite reasonable efforts made in this regard, there is insufficient information for the Investigator or the NCR Atleos' Ethics & Compliance Office to complete the investigation); b) the Report was not clear and the Reporter doesn't provide clarification or more information after the request of the Investigator or NCR Atleos' Ethics & Compliance; c) the Report is a repeated report made by the same Reporter, with the same content as the previous report which has been dismissed or resolved; d) the harm to the public interest or compelling private interest would not be proportionate to the limitation of the rights of the person affected by the Report resulting from the investigation of the Report; and e) for other justified reasons.
- 3.9. NCR Atleos' Ethics & Compliance and the Investigator will keep the records of every Report received, in compliance with the confidentiality requirements.

#### **4. Confidentiality and Data Protection**

- 4.1. NCR Atleos' Ethics & Compliance Office and the Investigator shall ensure that the identity of the Reporter is not disclosed to anyone beyond the authorized staff members competent to receive or follow up on Reports, without the explicit consent of that person. This shall also apply to any other information from which the identity of the Reporter may be directly or indirectly deduced.
- 4.2. The identity of the reporting person and any other information referred to in Section 4.1 may be disclosed only where necessary and imposed by applicable law in the context of investigations by the relevant national authorities or judicial proceedings, including with a view to safeguarding the rights of defense of the person concerned.
- 4.3. Reporter shall be informed before its identity is disclosed unless such information would jeopardize the related investigations or judicial proceedings. When informing the Reporter, NCR Atleos' Ethics & Compliance Office or the Investigator shall send the explanation in writing of the reasons for the disclosure of the confidential data concerned.
- 4.4. Any processing of personal data carried out pursuant to this Policy, including the exchange or transmission of personal data by the NCR Atleos' Ethics & Compliance Office and the Investigator, shall be carried out in accordance with the NCR Atleos' Data Protection Policy and the applicable laws.

## 5. Reporter Protections

- 5.1. To the extent permitted by applicable law, each Investigator shall hold the identity of each Reporter and everyone else that assists with Investigations, including witnesses (“Protected Persons”), the fact that a Reporter has made a report, the fact that any other person assisted with the Investigation, and any information provided by a Protected Person in connection with an Investigation confidential and only share it on a need to know basis in connection with the Investigation.
- 5.2. NCR Atleos is committed to encouraging NCR Atleos Associates to make good faith reports of Reportable Conduct and assist with Investigations. Whether or not a report is ultimately substantiated, NCR Atleos will protect the Protected Persons, acting in good faith, against Retaliation. “Retaliation” means (a) directly or indirectly acting or omitting to act, in response to a person having made a good faith report of Reportable Conduct or assisted with an Investigation in good faith, in order to terminate or suspend the Reporter’s employment or contract, demote the Reporter, take any adverse employment action against the Reporter, or otherwise harm, injure, discriminate against or harass the Reporter; and (b) anything that is considered to be retaliation under applicable law.
- 5.3. Retaliation is grounds for disciplinary action, including termination.

## 6. Policy Review

- 6.1. This Policy will be reviewed and updated, as applicable, at the direction of NCR Atleos’ General Counsel or Chief Compliance Officer.

## REFERENCES / RESOURCES

[Alertline](#)

[Privacy Policy | NCR Atleos](#)