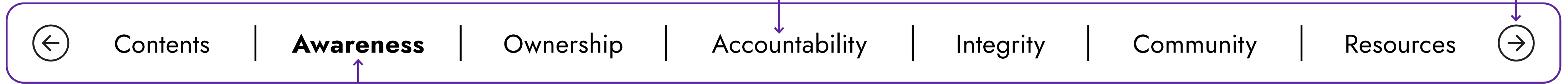


CODE OF CONDUCT 2025



Your way around ...

Navigation bar

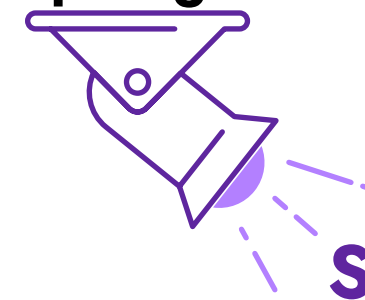


The topic you are currently exploring is bolded.

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.

Spotlight



Spotlight

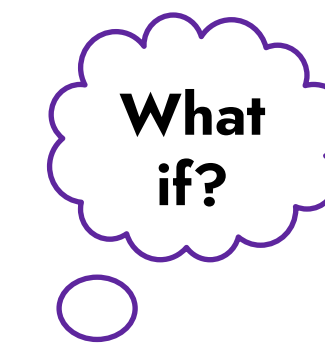
Spotlight calls out the important information; you don't want to skip this one!

Clouds

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



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



When you need help with navigating your decision path or you need a direction, this cloud gives an answer to your question.



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

Letter from James G. Kelly



Team,

As we honor our NCR legacy and execute our mission of creating the future of commerce, we reaffirm our dedication to helping our customers succeed by living our Shared Values and conducting business with integrity in accordance with the highest ethical standards and in compliance with all applicable laws, rules and regulations.

This Code of Conduct outlines our standards, aligning our mission and Shared Values so we can apply both to everything we do as a company. We will all be held accountable to adhere to this Code of Conduct.

Our reputation and our results depend on all of us.

My best,

James G. Kelly
CEO, NCR Voyix

Contents

A letter from CEO.....	3	Integrity.....	24
Awareness.....	5	Compliance.....	25
Shared values.....	6	Anti-bribery and Anti-corruption.....	26
What, Who and Why.....	7	Competition and Antitrust.....	28
Ethics and Compliance.....	9	Insider trading.....	30
How to report issues.....	11	Trade Compliance.....	32
Ownership.....	14	Community.....	34
IT infrastructure.....	15	Non-discrimination & equity.....	35
Open source.....	16	Safe work environment.....	36
Company funds and property.....	17	Gifts, entertainment and contributions.....	37
Intellectual property.....	18	Human rights.....	39
Accountability.....	19	Social media.....	40
Conflicts of interest.....	20	Resources.....	41
Company records.....	22		
Confidential information.....	23		

Awareness

- ➔ Shared values
- ➔ What, who & why
- ➔ Ethics and compliance
- ➔ How to report issues



Our shared values

NCR Voyix 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 One NCR Voyix, 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.



Customer First

We treat every **customer** like they are our only customer.



Expertise

We lead with **products** and solutions tailored to exceed our customers' expectations



One Team

We believe **diverse** perspectives help us approach challenges with optimism and **fun**.



Simplicity

We seek to **reduce complexity** and increase efficiency.



Inventiveness

We celebrate forward-thinking and **innovation**.

What?

The NCR Voyix Code of Conduct (“Code”) is our guide and point of reference for upholding our business principles. It sets the minimum standards for conducting business. While the Code describes our principles for business conduct, the Code does not cover every situation that may arise, nor establish every rule.

NCR Voyix has adopted more specific policies and standards that apply globally, geographically or to specific business units, functions or departments. These policies and standards can be found on the company’s intranet site. The Code is intended to complement, but not replace, the policies and procedures of the company. If any policy or procedure of the company conflicts with the Code, you must comply with the Code.

NCR Voyix operates globally, and if, at any time, this Code or our policies differ with local laws, rules, and regulations, you should comply with the more restrictive policies, laws, rules, or regulations. 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.

Who?

All NCR Voyix directors, officers, employees, contractors, agents and any other person representing or acting on behalf of NCR Voyix 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.

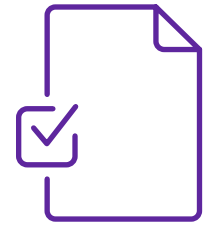
No one may direct you to violate, nor may you direct anyone to violate, this Code, even if doing so appears to be to our advantage.

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

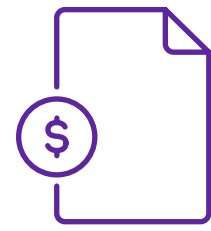
Why?

Ethical behavior and corporate social responsibility bring significant benefits to our business and protect and enhance our reputation, helping us:

- Attract customers to our brand and products.
- Attract, motivate, and retain the best talent.
- Attract investors who recognize the value of our mission and results.



Corporate Management Policies (CMP) define the way we do business and are organized by function such as: Human Resources (e.g., misconduct), Compensation (e.g., vacations), and Law (e.g., copyright).



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



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 on requirements for how we achieve our company’s goals and objectives.

They also:

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

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

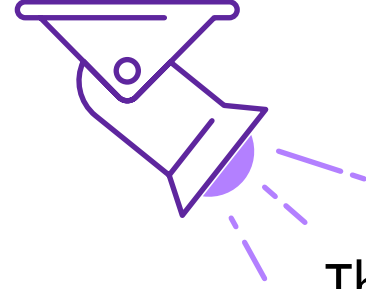


Ethics and Compliance

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 should never violate this Code, the underlying policies, or applicable laws, rules or regulations.

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

Spotlight



The **Ethics & Compliance Team** has accountability for promoting, monitoring and enforcing our Code. However, the ultimate responsibility for knowing and following the Code and our policies rests with each of us, individually.

When you have questions about the correct course of action, seek help from one of the resources identified in this Code or contact the Ethics & Compliance office.





What if?

You've read the Code and the policies 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:

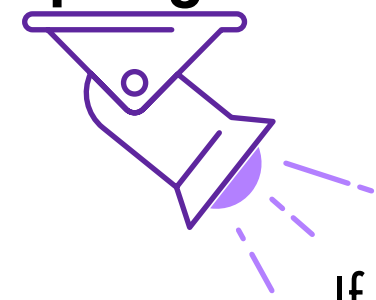
- Since NCR Voyix policies are designed to assist in decision making, your first step is to access and read the related policies carefully.
- If studying the policy doesn't help and you are still unable to apply or interpret it for your situation, discuss the policy with your manager or the policy owner.
- 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.

NCR Voyix does not tolerate retaliation against an employee for a question or report of misconduct made in good faith. A good faith report is a report made with honesty and good intention, regardless of whether the report is ultimately proved or not. Anyone who attempts to retaliate against an individual for making a good faith report will face disciplinary action, up to and including termination.

Spotlight



If you are uncomfortable identifying yourself to the Ethics & Compliance Office, you may ask questions and raise concerns anonymously, where permitted by law.



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?

Whistleblower

Nothing in this Code of Conduct (or any other Company policy) limits or prohibits in any way a person's ability to:

- Communicate, without notice to or approval by the Company, with governmental agencies and regulatory authorities;
- Participate in any investigation or proceeding that may be conducted by any governmental agency or regulatory authority, including providing documents or other information without notice to the Company; or
- Receive an award from any governmental agency or regulatory authority in connection with their providing such information or participating in any investigation or proceeding.

This paragraph applies in all situations and is meant to clarify and supersede any and all prior statements, policies, or procedures (including all other sections of this Code of Conduct) as well as any contracts or agreements made by the Company with any persons or entities.

Investigations

Our Ethics & Compliance Office investigates every report alleging violations of our Code of Conduct.

NCR Voyix will treat internal investigations and any reported violations of this Code in a confidential manner (consistent with appropriate evaluation and investigation). To the extent practical and appropriate under the circumstances, NCR Voyix will make reasonable efforts not to disclose the identity of anyone who reports a suspected violation. Reports submitted through the Company's third-party AlertLine provider, Navex Global, Inc.© will remain anonymous, unless the reporting person indicates otherwise or otherwise required by law. All employees are expected to cooperate fully in the investigation of reported violations.



We expect you to comply with this Code while conducting business. If you know of or suspect Code violations, you have an affirmative duty to report the information to our Ethics & Compliance Office.

When 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 HR business partner via HR Central.



To raise an issue, send an email to the Ethics & Compliance team.



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

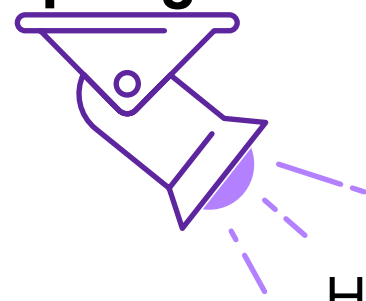
- ➔ IT infrastructure
- ➔ Open source
- ➔ Funds and property
- ➔ Intellectual property



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.

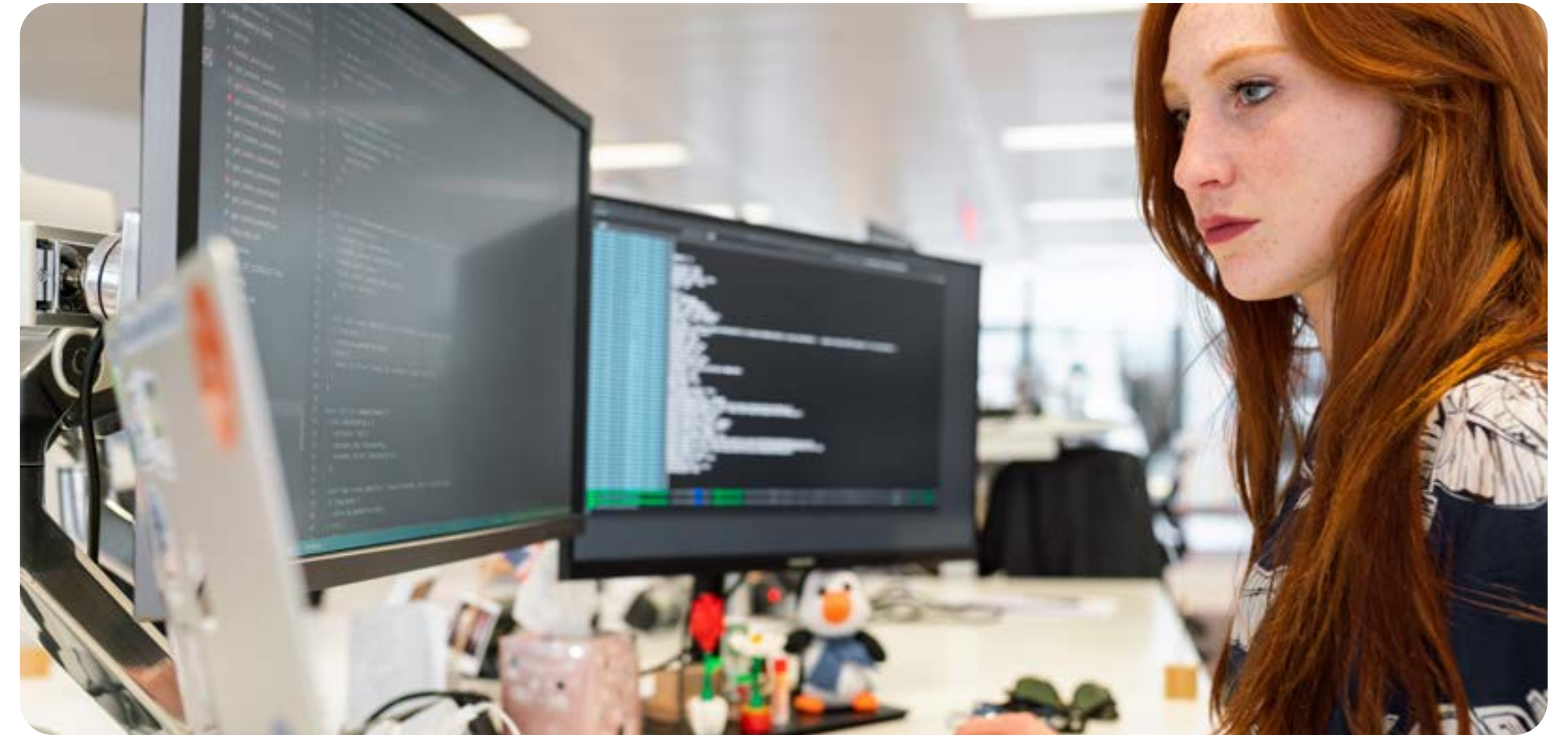
Spotlight



How we use our personal devices is our own business, but when we are using them for work, or to connect to NCR Voyix’s IT Infrastructure, this Code and our policies apply. When employees use their personal devices for work, those devices are subject to monitoring and review by NCR Voyix, and employees need to protect any company-related information that is exchanged or stored on those devices at all times.

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 Voyix’s IT infrastructure.



Quick check

For questions or concerns about Information Security contact Information.Security@ncrvoyix.com via email. To report unauthorized access to IT infrastructure, create an incident via Cyber Defense Center hotline.

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

If you suspect a device has a virus/malware, contact the Cyber Defense Center directly at +1 678 808-7448.

For questions or concerns about Data Privacy or Protection, contact Privacy Office.



Open source

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

NCR Voyix 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 Voyix 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 Voyix product, service, or internal project, you must obtain prior written approvals from the technical teams in the CTO organization and the Law Department.

To find or request new technology (including AI), employees should go to ServiceNow portal and follow the instructions for making a request.

We have introduced new capabilities within our internal environment, such as Microsoft Copilot for Edge and NCRV GPT, to help us achieve success in a smart and safe manner.

Company funds and 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 intellectual property).

Company assets include but are not limited to:

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

Spotlight



You should only share your NCR Voyix email address for NCR Voyix business purposes. Using it as a username for personal accounts could create an unnecessary risk for the company if that information is overused or shared.

Any suspected Fraud, Theft, or Misuse of Company Assets must be reported immediately.



Intellectual property

You are required to protect all NCR Voyix intellectual property (IP), including from misuse, theft, and infringement, and not to misuse, steal, or infringe any intellectual property of any third party.

Intellectual property (IP) laws and the associated rights provided by them protect creations, innovations, and confidential information, including software and other technology. We refer to those rights and the items they protect collectively as “IP”. In general, IP rights protect against the unauthorized use of creations, innovations, and confidential information.

Certain IP rights include:

- **Copyright**, which protects an original work of authorship embodied in physical, electronic, or other form, including software, an image, a slide, a presentation, or other documentation
- **Patent**, which protect ideas, and in particular, inventions
- **Trademark**, which protect a word, name, symbol, logo, or slogan that is used with, and to identify the source of, a product or service, including a brand name like NCR Voyix
- **Trade secret**, which protect confidential information that is subject to reasonable measures to preserve its secrecy and derives value from its secrecy.

All IP created or developed by you while working for NCR Voyix (including the IP rights arising or resulting from those creations and developments) is owned by NCR Voyix, and as part of your employment by NCR Voyix, you have an obligation to assign them to NCR Voyix. You also have an obligation to protect NCR Voyix confidential information and third-party confidential information you learn while working for NCR Voyix, both during and after you employment with NCR Voyix, and to submit documentation about any invention(s) you create (which documentation is known as invention disclosure statement (IDR)) to the IP Law Group.

Infringing or misappropriating IP rights can result in civil and, in some cases, criminal penalties. Improper disclosure of confidential information can result in a loss of the associated rights, including trade secret rights. And improper use of our trademarks can cause damage to them, potential loss of those rights, and even result in penalties.

We all must obtain, maintain, and protect our IP and respect the IP rights of others, including in accordance with our policies and procedures. If you have a question about the use of legally protected IP or other proprietary information, including computer software of third parties, you should contact the Law Department, and in particular, the IP Law Group.

Accountability

- ➔ Conflicts of interest
- ➔ Company records
- ➔ Confidential information



Conflicts of interest

A conflict of interest, or even the appearance of one, can hurt the Company's business and reputation.

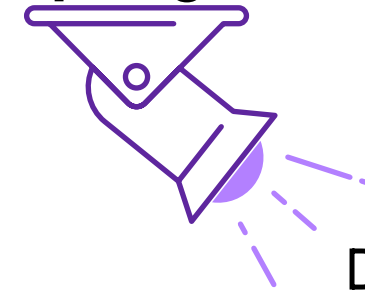
A conflict of interest occurs when your personal interest (or the interest of a member of your family) interferes or conflicts with the interests of NCR Voyix. An apparent conflict of interest is a situation where an observer might conclude that your judgment was influenced by something other than the Company's best interest.

The Code cannot cover all possible areas in which conflicts of interest might arise, but some examples of conflicts of interest include:

- Engaging in or having a personal interest in a competing business
- Receiving improper personal benefits as a result of your position at NCR Voyix
- Using your position with NCR Voyix or using Company information or property for personal gain
- Working simultaneously with or having a material interest in a competitor, client, or supplier

If you're not sure if a situation represents a conflict, ask your manager, HRBP, or Ethics and Compliance office.

Spotlight



Disclosure of all actual or potential conflicts of interests is mandatory. You are required to discuss any situation in which you are involved or plan to become involved which could result in an actual, potential or apparent conflict of interest with your manager. Your manager will discuss the matter with the Ethics & Compliance Office so that the conflict can be assessed, and appropriate measures may be taken.

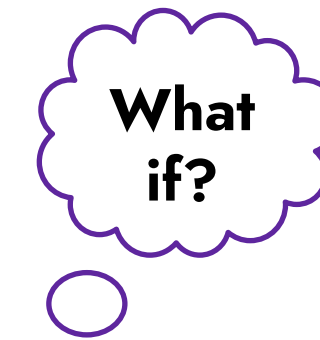


Spotlight



Avoid any activity that can pose a conflict or affect your objectivity in making business decisions on behalf of NCR Voyix.

If you're not sure if a situation represents a conflict, ask your manager, HRBP, or Ethics and Compliance office.



What if?

I want to perform some outside work as a paid consultant for a small tech company. Is this permitted?

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 office to fully understand whether or not the position creates a real or perceived conflict of interest.

Accuracy and 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.

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



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

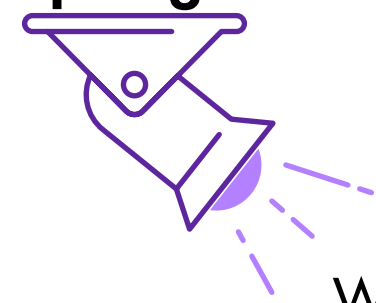
You must immediately inform our Chief Accounting Officer if you become aware of any material non-financial or financial information that could impact the company or result in a gain or loss. This information must be accurately recorded, processed, summarized, and reported to senior management to enable timely decisions regarding required disclosures. The Ethics & Compliance Office can assist you in making your report and can be reached via the Ethics & Compliance mailbox. The Alert Line is available when and if questions arise.

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. You have a duty to safeguard all confidential information of NCR Voyix or third parties with which the company conducts business, except when disclosure is authorized or legally mandated. We must use confidential information appropriately. We may disclose it to other NCR Voyix members or third parties only if they have a legitimate, business-related need to know.

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.

Spotlight



Within the scope of your job, you may come into contact with a variety of confidential information concerning the company and other parties with whom we conduct business. Unauthorized disclosure of any confidential information is prohibited.

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 Voyix obtains from third parties.
- Information concerning potential acquisitions or divestitures
- Company financial outlooks and projections

Integrity

- ➔ Compliance
- ➔ Anti-bribery & Anti-corruption
- ➔ Competition and Antitrust
- ➔ Insider trading
- ➔ Trade compliance



Compliance with Laws, this Code, and Policies

As an NCR Voyix employee, you must adhere to the company's Code of Conduct, internal policies, and all applicable laws and regulations when conducting business. Your actions should always reflect our commitment to ethical and lawful behavior.

Claiming ignorance of this Code or any policy requirements will not excuse a violation. It is your duty to familiarize yourself with the company's policies and relevant laws and regulations.

Spotlight



Your manager cannot instruct you to violate NCR Voyix policy or law. If you believe an NCR Voyix policy conflicts with legal requirements, or if your manager instructed you to violate any NCR Voyix policy or applicable law, escalate your concerns to the Ethics & Compliance Office.



Anti-bribery and Anti-corruption

We are committed to compliance with the anti-bribery and the anti-corruption laws of all countries and territories in which we operate or do business. 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 influence an act or a decision to obtain, retain and/or direct business or secure an improper benefit of any kind.

Violating anti-bribery and anti-corruption laws can lead to large fines and civil and criminal penalties which can cause serious harm to our reputation.

You may not promise, offer, give or authorize, directly or indirectly, a bribe or anything of value to anyone to attempt to improperly influence any act or decision to obtain or retain business, or to secure any improper advantage for NCR Voyix. 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.

Spotlight



Never compromise our reputation by conducting business in a dishonest manner.





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 and Antitrust

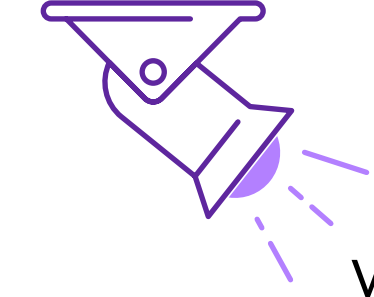
We deal fairly with our customers, suppliers, strategic partners, employees, and competitors. We compete vigorously, but always fairly and ethically. Our successes come from the strength of our people, products, and services – not from unfair business practices.

Antitrust laws, sometimes called competition laws, encourage healthy and fair competition among businesses. Antitrust laws forbid agreements between competitors on the prices or other terms on which they will sell products or services or that divide customers or markets. Antitrust laws may also include rules regarding exclusive dealing, bundling and tying, below-cost pricing, preventing or discouraging resellers from discounting, fixing minimum resale prices, or (in a few countries) discriminating between similarly situated resellers with respect to pricing and promotional payments.

The laws associated with antitrust, and competition can be complex, and the consequences of violating these laws can be severe. It is critical to know our policies and consult the Law department before taking any of the following actions:

- Communicating with any competitor relating to price or any term that affects pricing
- Dividing or allocating markets or customers with a competitor or other third party
- Agree with a competitor to boycott another business
- Put inappropriate conditions on purchases or sales
- Misrepresent the company's or our competitors' products or services

Spotlight



We do not seek competitive advantages through illegal or unethical business practices. You should deal fairly with the company's customers, vendors, service providers, suppliers, competitors, and employees. You may not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.





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.

Insider trading

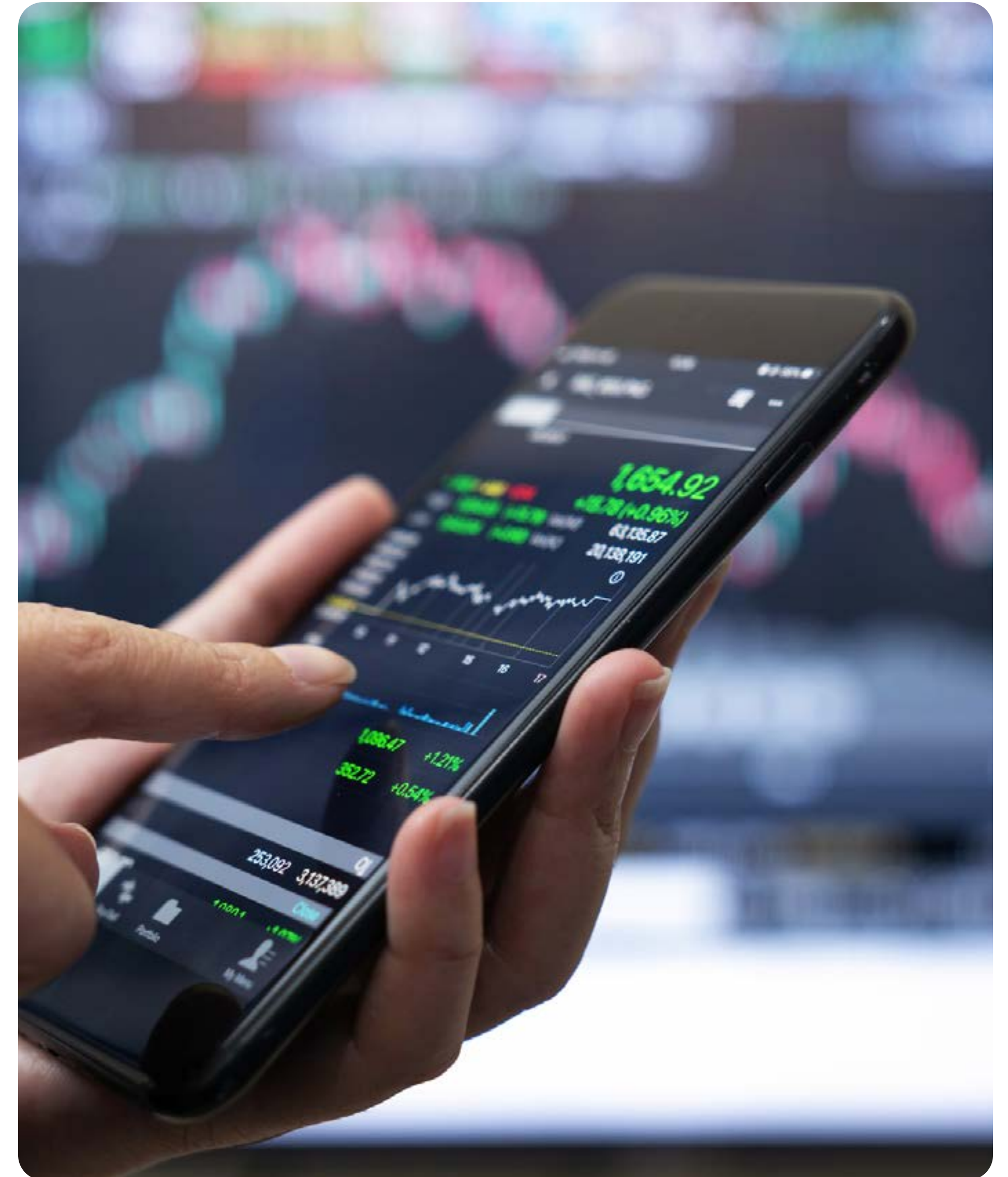
In the course of your job, you may possess material nonpublic information (this is “insider” information that is not generally known to the public and that may be significant to an investor) about NCR Voyix or other companies with whom we deal that could have an impact on the value of Voyix stock or other companies’ stock. Therefore, you must comply with NCR Voyix Insider Trading Policy and applicable securities laws when dealing in securities.

If you have material nonpublic information relating to NCR Voyix or our business, you, nor any other person or entity acting on your behalf, may buy or sell NCR Voyix securities. This also applies to trading in the securities of another company (i.e., NCR Voyix customers, suppliers, vendors, other business partners, and at times, competitors) if you have material nonpublic information about that company obtained by virtue of your position at NCR Voyix.

Generally, material nonpublic information is information about a company that has not been widely disclosed and available to the public and is likely to influence an investor to buy, sell, or hold a company’s stock. Material nonpublic information can be positive or negative and is not limited to financial information. It could be proposed or pending major corporate transactions, non-routine dividend action, actual or projected financial information about the Company or one or more of its lines of businesses; acquisition or loss of major contracts, major products or services, major organizational changes; cybersecurity incidents, significant litigation or legal developments or changes in corporate strategy. If you are unsure about whether information is material, refrain from trading until the information becomes public, or contact the Law department for advice.

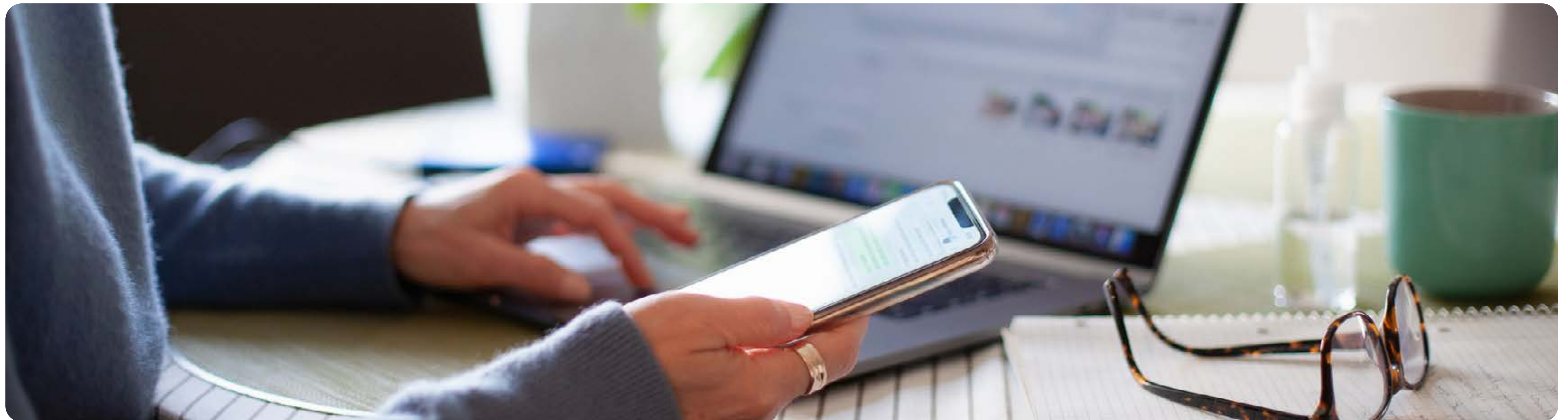
You may not share material non-public information about NCR Voyix or another company with friends, family members, or other third parties (this is called “tipping”). Doing so may not only be a violation of your duty to keep such information confidential, but also may be a violation of U.S. federal and state laws, and the laws of many countries in which we operate.

You may not “hedge” or engage in any transaction where you may profit from the short-term speculative swings in the value of our NCR Voyix securities.



Quick check

- Never provide material non-public information about NCR Voyix or other companies known to you through your work at NCR Voyix
- Restrict access to material non-public information about NCR Voyix 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, including NCR Voyix.
- Never buy or sell NCR Voyix securities or another company’s publicly traded stock while in possession of material information, whether or not a blackout period is pending



Trade compliance

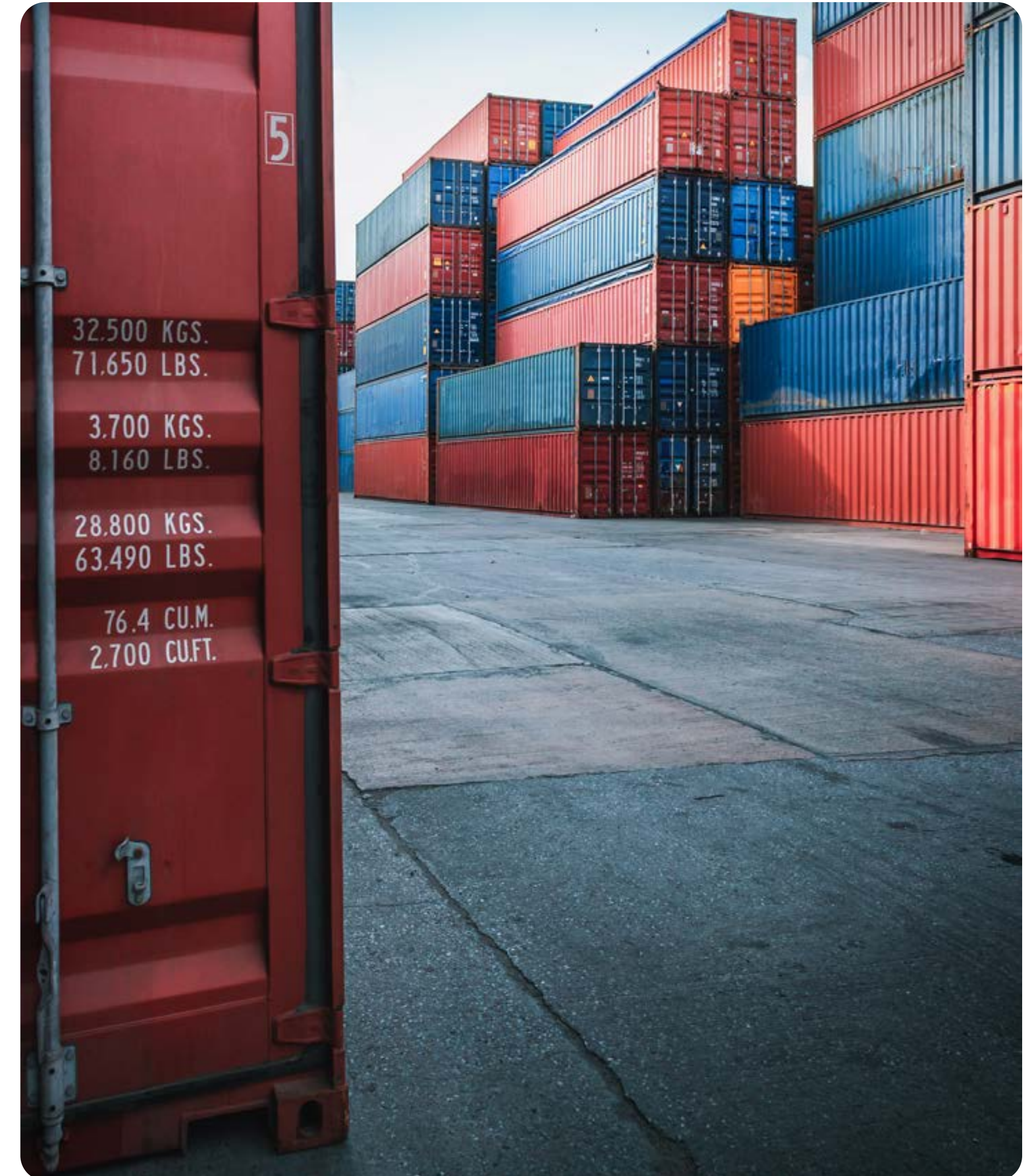
As a global company, we must be aware of international trade laws that regulate the imports and exports of our products and services. Import laws typically govern what can be imported into a country, how the articles must be marked, how the imported merchandise must be valued, and what duties must be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

Quick check

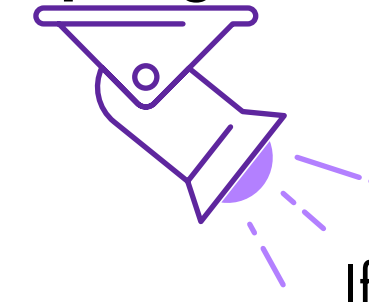
Export laws typically require consideration of the following questions:

- 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?





Spotlight



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

What if?


 A purple thought bubble icon containing the text 'What if?'.

You're getting ready for your business trip, and a colleague asks you to bring an item for them 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 Voyix 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 NCR Voyix products), transporting commercial goods in your personal luggage requires pre-approval. For approval and advice on how to do this legally, contact the Ethics & Compliance team.

Community

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



Non-discrimination, harassment and Equal Employment Opportunity

NCR Voyix is firmly committed to a policy of equal opportunity for its employees and applicants. 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. We also do not permit retaliation for engaging in related protected activity.

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



Respect is the foundation of ethical behavior, and mutual respect reinforces good relationships.

All employees should work to create an environment where everyone feels welcomed, fairly treated, and fully supported to do their best.

Quick check

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

Safe work environment

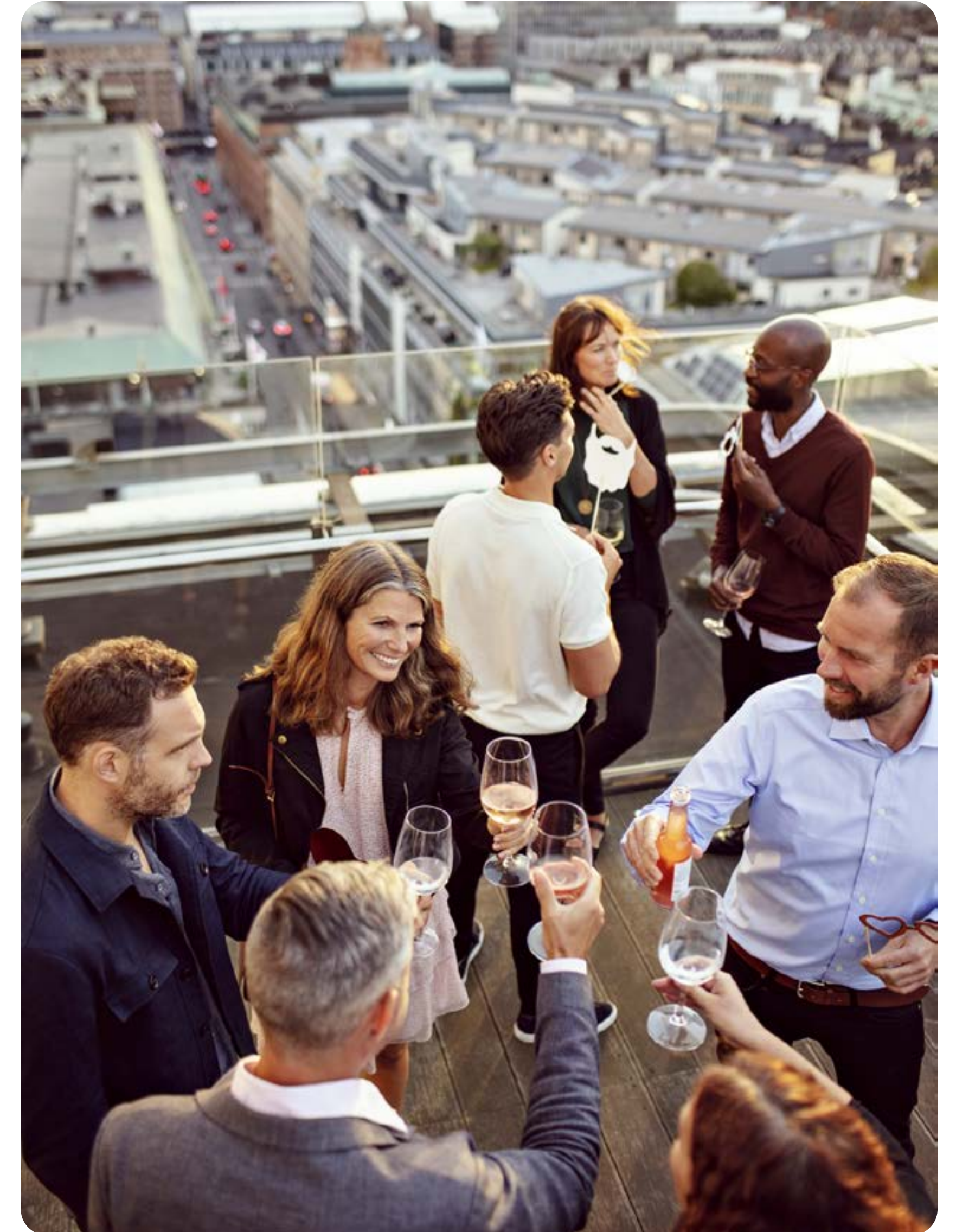
At NCR Voyix, we have a zero-tolerance policy for acts or threats of violence. Employees should be familiar with and follow all security and safety guidelines and report any suspicious activity, including threats and actual acts of violence occurring while conducting business, both on and off our premises. 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. In the rare circumstance where alcohol is permitted during NCR Voyix business or social events, you are expected to exercise good judgment and moderation and consume alcohol responsibly.

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.



Gifts, entertainment and contributions

You must be careful to avoid even the appearance of impropriety in giving or receiving gifts and entertainment. Occasional business meals or events, 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 give or accept gifts from NCR Voyix business associates and individuals or entities outside of NCR Voyix with whom we conduct or plan to conduct business that are infrequent, modest in value, consistent with local business practices, and reported accurately in our books and records. It is strictly prohibited to offer any gift or contribution to a government official or to take them out for entertainment under any circumstances.

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.

Political contributions

The Government Relations department must provide approval before any contributions or donations are made on the company's behalf to any political parties, activities, or initiatives.





Gifts and entertainment with government officials

Government officials are subject to varied and complex rules regarding acceptance of gratuities, often prohibiting them from accepting anything of value unless expressly authorized by applicable statute or regulation. The FCPA prohibits the offering, paying, promising to pay or authorization of payment of money, gifts, or anything of value to a government official for purposes of influencing any act or decision by the official, inducing the official to use his or her influence to affect any act or decision or seeking any improper advantage in order to assist NCR Voyix in obtaining or retaining business in a foreign country.

You must receive prior written approval from the Law department before entertaining or giving any item of a value to a government official. Keep in mind that government officials, under the FCPA and other similar laws, can include executives and employees of government-owned corporations, universities, and other entities as well as family members of these individuals. Always ask if you have some doubt regarding if an individual or entity may qualify as a government official.

Quick check

All gifts and donations to charitable organizations using Company funds or other property require prior written approval from the NCR Foundation via the Ethics & Compliance Office.



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.

Social media

While NCR Voyix employees are free to express their thoughts and opinions, remember that your activity can impact NCR Voyix and its reputation. Your professional social media activity, and in some cases your personal social media activity, must comply with the Code, our policies and any applicable laws and regulations. Always be respectful of others and never post anything that would constitute a threat or harassment.

Corporate social media channels are viewed as official information channels for publicly-traded companies. Do not disclose confidential NCR Voyix information. Understand that information you receive not explicitly labeled as confidential, such as a conversation about a new product, may be non-public and not appropriate to share. If you are not sure, ask your manager or the Law department.

Understand and follow our Social Media Policy and other policies set forth by the Marketing department. Special care should be taken when using social media, professionally or personally, when your account is associated with NCR Voyix. Social media activity that violates your confidentiality obligations or negatively impacts NCR Voyix's reputation may result in disciplinary action.

Spotlight

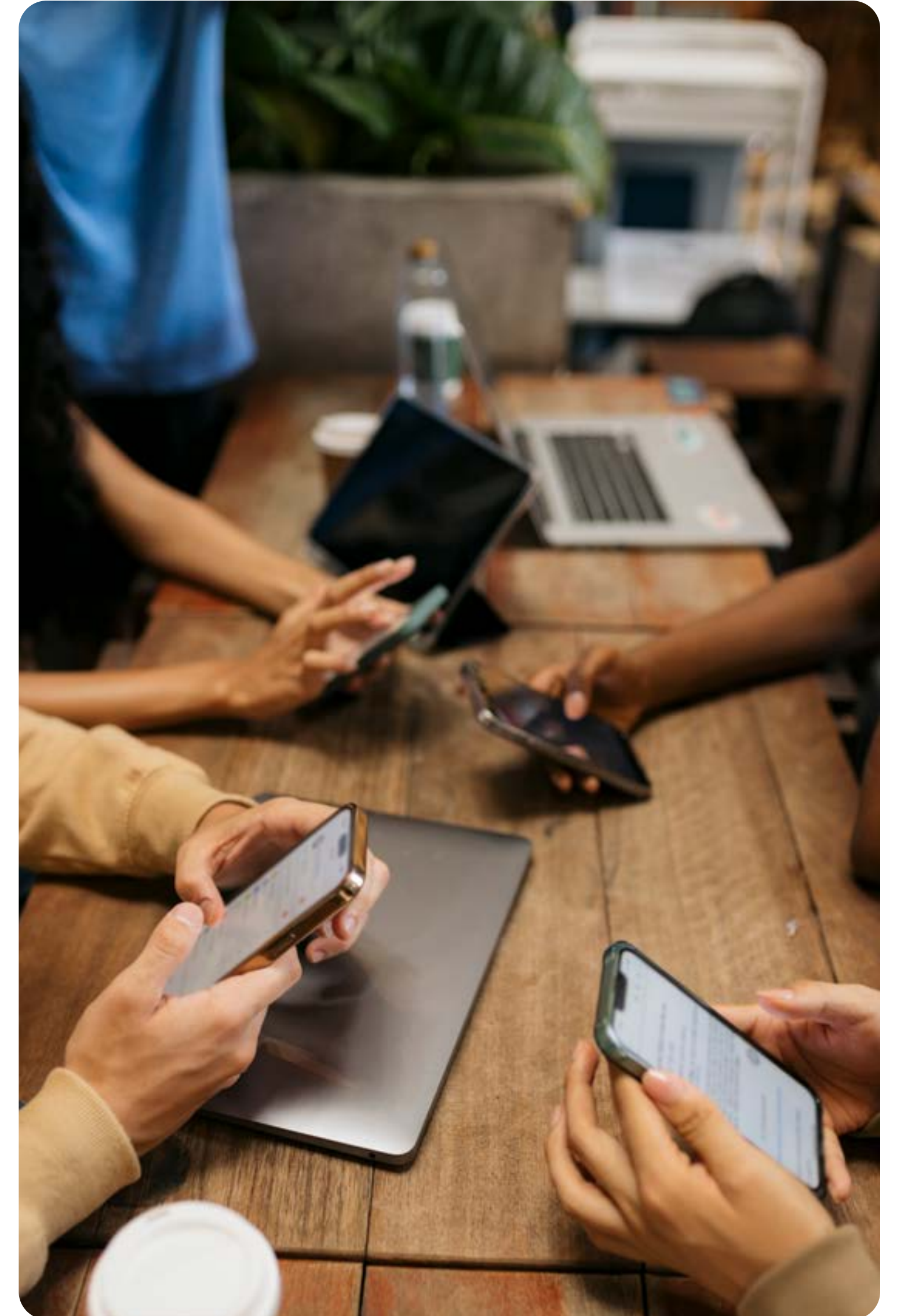


Use good judgement: Nothing is truly private, no matter what your privacy settings are, so simply don't post something that you wouldn't want your employer to see, including anything about NCR Voyix that is confidential.

Quick check

Disclose affiliation

When sharing content from the Company or opinions related to NCR Voyix or the industry, be transparent about your role and affiliation with NCR Voyix. In any communications, it must be clear that the information you share is personal and not an official NCR Voyix communication.



Resources



This Code is our guide and point of reference for upholding our shared principles. It sets forth minimum standards for how we express our principles while conducting business. As a condition of your employment you are required to comply with this Code and all applicable company policies. 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.

If you have specific questions related to any of our corporate management policies, then please reach out to NCRVoyix.Policies@ncrvoyix.com for additional assistance.

Contact Options:

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

- **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.
- **Call the Alert Line.** You may contact NCR Voyix’s third-party Alert Line provider over the phone. The Alert Line supports many languages.
- **Send an e-mail directly to the Ethics & Compliance mailbox** at ComplianceOffice.Ethics@ncrvoyix.com. This method is often appropriate for questions about how to apply an NCR Voyix policy. However, you can use this method to also raise compliance concerns.

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, by contacting the Alert Line. Anyone who attempts to retaliate against an individual for making a good faith report will face disciplinary action, up to and including termination.



Quick check

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



Thank you.

