

Modern Slavery Statement

INTRODUCTION

This Modern Slavery Statement, published pursuant to Section 54 of the Modern Slavery Act 2015, describes the steps that NCR Limited and Zynstra Limited (“NCR Voyix UK”) have taken to address modern slavery in our organisation and in our supply chain. This statement covers NCR’s fiscal year ending December 31, 2025.

OUR BUSINESS

Our Company

NCR Voyix Corporation is a global platform-powered leader in unified commerce for shopping and dining, empowering customers to simplify transactions, optimize and scale operations and deliver superior experiences to customers through our modernized suite of microservices-based applications and comprehensive service offerings. NCR Voyix Corporation, headquartered in Atlanta, Georgia, operates in nearly 30 countries with approximately 13,500 employees. We recently introduced our modernized suite of microservices-based SAAS applications, natively integrated with our proprietary, cloud-based platform, to deliver our next-generation point-of-sale and self-checkout solutions for retail and restaurant customers.

NCR Voyix Corporation is the ultimate parent company located within the United States, and it operates in the United Kingdom through its subsidiaries, NCR Limited, headquartered in London, England, and Zynstra Limited, headquartered in Bath, England.

NCR Voyix Corporation, including its subsidiaries and affiliates, is committed to improving practices to combat slavery and human trafficking and does not tolerate any such practices in its supply chain. NCR Voyix Corporation takes steps to minimise the risk of NCR Voyix Corporation working with any organisation that engages in such practices. As policy is set globally, NCR Voyix Corporation and NCR Voyix UK use the same policies and procurement processes, this statement covers the measures adopted by NCR Voyix Corporation as a whole, with specific emphasis on the process in the United Kingdom.

Our Supply Chain

NCR Voyix Corporation has a global supply chain, with over 7,500 suppliers providing service parts, goods and services, software, and transportation and logistics.

COMPANY POLICIES AND GOVERNANCE

Policies

NCR Voyix Corporation supports and respects the protection of internationally proclaimed human rights as proclaimed in the United Nation’s Universal Declaration of Human Rights and the Ten Principles of the United Nations Global Compact. We are committed to developing, maintaining, and improving systems to prevent involvement in modern slavery across our operations and supply chain.

This commitment is reflected in our Code of Conduct, our Third Party Code of Conduct, and our Human Rights Policy, all of which are regularly reviewed and updated. Our Code of Conduct mandates ethical business practices, including limits on work hours, adherence to minimum wage standards and proper overtime compensation.

Our Human Rights Policy affirms our zero-tolerance on modern slavery, reinforces our support for human rights, and outlines our dedication to fair labour, and environmental sustainability, and a workplace that prevents and detects corruption, and appropriately addresses instances of non-compliance.

Governance and Training

Each fiscal year, NCR Voyix Corporation requires all employees to complete a training and certification module on NCR's Code of Conduct ("Training"). The Training reviews, among other topics, NCR Voyix Corporation's Human Rights Policy which emphasizes recognising and reporting suspected instances of compliance failures both inside NCR Voyix UK and within NCR Voyix Corporation's supply chain. At the end of the Training, each employee is required to certify that he or she will comply with the NCR Code of Conduct, and to identify any concerns and exceptions so that they may be addressed.

NCR Voyix Corporation and NCR Voyix UK provide Training to all staff to ensure all staff are familiar with the relevant policies annually. The Training was updated in 2025 and all staff were required to again complete this Training.

Reporting

NCR Voyix Corporation employees are required to raise and report any concerns of wrongdoing on any of the multiple avenues that NCR Voyix Corporation provides to report their concerns. Employees can report concerns to their management teams, local human resources or legal departments, and a company-wide Ethics and Compliance Office. NCR Voyix Corporation has a secure and confidential whistle-blowing process through an alert line whereby employees can report concerns anonymously. Employees are strongly encouraged to use this process if they become aware of any legal violations or breaches of NCR Voyix Corporation policies.

Third parties doing business with NCR Voyix Corporation are also expected to promptly report any known or suspected violations of NCR Voyix Corporation's Third Party Code of Conduct, including modern slavery provisions, to the alert line. NCR Voyix Corporation does not tolerate retaliation against individuals who make good faith reports of misconduct, including reports of potential violations of NCR Voyix Corporation policies or our commitment to fight modern slavery.

Employment Practices and Procedures

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

- We adhere to the “Employer Pays” principle - No employee should pay for a job - the costs of recruitment should be borne not by the employee but by the employer.
- We pay employee wages that meet or exceed legal wage requirements.
- We hire only individuals who are lawfully permitted to work in the jurisdiction where they are employed.
- We explain key terms of employment to prospective employees during the hiring process, including wages and benefits; work location; living conditions and associated costs (if applicable); and whether the nature of the work is hazardous.
- We enter into employment contracts that contain, or we otherwise document, the salient terms of employment, including the pay rate and pay frequency in accordance with local law.
- We do not prohibit employees from terminating their employment with NCR Voyix Corporation and NCR Voyix UK.
- We do not destroy, conceal, confiscate or otherwise deny access by any employee to his or her identity or immigration documents.
- We have established programs for international work assignments that include provisions such as home visits, paid transportation to and from the home country, and reasonable living accommodations that meet or exceed host country housing and safety standards. Employees on international work assignments may choose to accept or decline the provisions offered by the company.

SUPPLY CHAIN POLICIES AND GOVERNANCE

Policies

NCR Voyix Corporation and NCR Voyix UK expect that its suppliers will conduct business ethically and will comply with the law. NCR Voyix Corporation and NCR Voyix UK require its suppliers to agree in their contracts with us that they will conduct business ethically, comply with applicable laws and adhere to our Third Party Code of Conduct. NCR Voyix Corporation has adopted a Third Party Code of Conduct, which includes, among other things, that Third Parties must prohibit human trafficking or forced labor of any type, and in compliance with the modern slavery act, including but not limited to sex trafficking, debt bondage, forced prison labor, and child labor. It also represents NCR Voyix Corporation and NCR Voyix UK’s desire to engage with suppliers that have a shared commitment to its ethical, legal and social business standards and values.

We use different factors to assess the potential risk of modern slavery in our supply chains, including geographic risk (e.g. Tier 2 countries like Hungary, India, and Mexico) and sectoral risk (e.g. hardware procurement). NCR Voyix Corporation uses a third party risk intelligence platform that aggregates data from global watchlists, sanctions database, and ESG ratings to assign risk scores to suppliers (the Tools).

Risks of Modern Slavery

NCR Voyix Corporation considers the Responsible Sourcing Tool¹ and the U.S. State Department 2025 Trafficking in Persons Report² when evaluating its Modern Slavery Risks and acknowledges that while the software-as-a-service and payments services sectors are low risk for modern slavery, the procurement of hardware from third-party manufacturers in Tier 2 countries such as Hungary, India, and Mexico may pose a higher risk of modern slavery.

Supplier risk management

We have a comprehensive risk assessment and due diligence program in place for suppliers including confirmation that suppliers acknowledge acceptance of the Third Party Code of Conduct expectations. We risk assess suppliers at the inception of the business relationship, track changes in their risk profiles on an ongoing basis and identify negative news related to our highest risk suppliers. If a supplier is flagged for human rights risk, they will be subject to enhanced due diligence. NCR Voyix Corporation aims to prevent and mitigate adverse impacts we may be directly linked to by taking appropriate action to mitigate such risks, which may include exercising leverage in our business relationships. Pursuant to the Third Party Code, NCR Voyix Corporation maintains the right to monitor supplier compliance and audit their control environment. We are also entitled to request information from our suppliers with respect to their compliance with the principles of the Third Party Code.

If NCR Voyix Corporation identifies items of significant non-compliance within its supply chain, irrespective of the nature of the supplier, we are committed to addressing concerns and seeking corrective action. If any responses to the Questionnaire or Onboarding Questionnaire raise any concerns, these are escalated to procurement senior management for review before the supplier is permitted to work with NCR Voyix Corporation. The review of such responses did not reveal any instances of modern slavery in our supply chain for the Reporting Period. We have identified that the areas in our supply chain with the lowest risk are areas where operations are handled by staff directly employed by us. Where our suppliers use subcontractors with whom we do not engage or contract with ourselves, these are identified as a higher risk which we review further prior to engaging with the supplier.

Among other permitted methods of reporting, instances of modern slavery may be reported in accordance with NCR Voyix Corporation's whistle-blower policy and procedure, which allows for anonymous reporting.

The Training, which NCR Voyix Corporation conducts annually, also increases the awareness of the business in identifying issues and risks relating to modern slavery.

ASSESSING EFFECTIVENESS

NCR Voyix Corporation is working to develop key performance indicators (KPIs) to assess the effectiveness of its modern slavery risk mitigation efforts. These will potentially include:

- Number of suppliers
- Percentage of suppliers completing due diligence questionnaires
- Completion rates of employee training modules
- Number and nature of reports received through the whistleblower hotline (Alertline) related to human rights concerns
- Audit findings related to modern slavery compliance (if any)

The Legal and Compliance teams conduct an annual review of the effectiveness of our modern slavery controls. This includes analyzing training outcomes, supplier risk trends, and audit results. Findings are reported to senior leadership and used to refine policies, training content, and supplier engagement strategies.

We also seek feedback from internal stakeholders and external advisors to evaluate the clarity, accessibility, and impact of our modern slavery policies and procedures.

¹ <https://www.responsible sourcing tool.org/>


² [Trafficking in Persons Report 2025 \(state.gov\)](#)

BOARD APPROVAL

This statement was reviewed and approved by the Board of Directors of NCR Limited on 23 April 2026 and by Zynstra Limited on 23 April 2026. The Boards of Directors for these entities will review and update this statement on an annual basis.

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

Signed: 
Richard Paul McKenzie
NCR Limited

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